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WELLS WILDERNESS RECOMMENDATIONS

Final 1987 Environmental Impact Statement

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT ELKO, NEVADA

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FINAL WILDERNESS
ENVIRONMENTAL IMPACT STATEMENT
for the
WELLS RESOURCE AREA
NEVADA

Prepared by
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE

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The purpose of the Proposed Action is to manage and preserve the wilderness characteristics on 145,287 BLM acres and continue to manage 30,664 BLM acres for uses other than wilderness. These acreages represent portions of the Bluebell, Goshute Peak, South Pequop and Bad Lands Wilderness Study Areas (WSAs) in Elko County, Nevada.

The Federal Land Policy and Management Act of 1976 (FLPMA) mandates BLM to manage the public lands and their resources under the principles of multiple use and sustained yield. Wilderness values are identified as part of the spectrum of multiple land use values to be considered in BLM inventory, planning, and management. Section 603 of FLPMA requires a wilderness review of BLM roadless areas of 5,000 or more acres and roadless islands. The BLM inventory process identified wilderness study areas which have the mandatory wilderness characteristics (size; naturalness; solitude and/or primitive recreation opportunities). Suitable or nonsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior. The President will then make recommendations to Congress. Areas can be designated wilderness only by an act of Congress.

For further information please contact: Rodney Harris, District Manager, Bureau of Land Management, P.O. Box 831, 3900 E. Idaho St., Elko, Nevada 89801 or call (702) 738-4071.

Date the Final Environmental Impact Statement was made available to the Environmental Protection Agency and the public: ______________________

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SUMMARY

The purpose of the Proposed Action is to manage and preserve the wilderness characteristics on 145,287 BLM acres and continue to manage 30,664 BLM acres for uses other than wilderness. These acreages represent portions of the Bluebell, Goshute Peak, South Pequop and Bad Lands Wilderness Study Areas (WSAs) in Elko County, Nevada.

The four WSAs being studied are covered by the Wells Area Resource Management Plan and are listed in Table 1-1 below.

TABLE 1-1

LIST OF WILDERNESS STUDY AREAS

WSA Name	Number	Acreage	County
Bluebell	NV-010-027	55,665	Elko
Goshute Peak	NV-010-033	69,770	Elko
South Pequop	NV-010-035	41,090	Elko
Bad Lands	NV-010-184	9,426	Elko

ISSUES

The scoping process for the Wells Wilderness EIS encompassed issues identified by the BLM staff; by the public at public meetings during the initial issues/planning criteria phase (March and April, 1979); by contacts with state and local governments and various user and interest groups (November, 1979); by solicitation of comments through two Federal Register notices (May, 1980 and August, 1983); by comments received as a result the distribution of the draft version of issues and planning criteria via the local newspaper, mailing lists and newsletters (January, 1981); at workshops held in Reno, Elko and Wells, Nevada (September, 1982); from written comments on the draft Wells Resource Management Plan/EIS by the public and federal, state and local agencies (May 20, 1983 to August 19, 1983); and at two public hearings in Reno and Wells, Nevada (June 1983). During the scoping period the United States Fish and Wildlife Service was consulted concerning the potential effects of wilderness designation on threatened or endangered species. The environmental issues identified for analysis in this EIS follow. The issues apply to all WSAs unless specifically noted otherwise.

Impacts on Wilderness Values
Impacts on Recreational Off-Road Vehicle Use
Impacts on Development of Mineral Resources
Impacts on Woodland Product Harvest

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The following issues were identified in scoping but were not selected for detailed analysis in the EIS:

Impacts on Bighorn Sheep Reintroduction
Impacts on Bald Eagle Wintering Habitat
Impacts on Wildlife
Impacts on Visitor Safety
Economic Impact on Livestock Operations
Impacts on Grazing Facility Maintenance and Construction
Impacts on Cultural Resources
Impacts on Military Overflights
Impacts on Domestic Sheep Grazing
Impacts of Visitor Use on Bad Lands WSA
Impacts of Visitor Use on Bighorn Sheep
Impact on Diversity within the National Wilderness Preservation System

The following is an issue that was frequently identified during scoping. Since it is not an environmental issue, but is a program concern, it was dropped from further consideration in the EIS.

The WSAs being studied are not what Congress intended to be included in the National Wilderness Preservation System

Alternatives and Conclusions

The alternatives assessed in this EIS include: (1) a Proposed Action for each WSA, (2) an All Wilderness Alternative for each WSA; (3) a No Wilderness Alternative for each WSA; and (4) a Partial Wilderness Alternative(s) for the four WSAs.

BLUEBELL WSA (NV-010-027)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 41,324 acres of the Bluebell WSA would be recommended suitable for wilderness designation and 14,341 acres would be recommended nonsuitable for wilderness designation.

Conclusion.

On the 41,324 acres designated as wilderness, naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained except in the Erickson Canyon area. An open pit mine in the Erickson Canyon area would result in the loss of naturalness on 300 acres due to surface disturbance associated with the mining operation. Sights and sounds from the mining operation would result in the loss of solitude on 5,000 acres. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads solitude would be locally impacted by vehicle travel.

On the 14,341 acres not designated as wilderness, naturalness would be lost on 22 acres due to 2 miles of mining exploration roads (3 acres) and 10 miles of seismic lines (10 acres). Naturalness and opportunities for solitude would be lost over a 2400 acre area due to harvesting of Christmas trees and firewood.

Recreational ORV use would be eliminated on the 41,324 acres designated wilderness and 310 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 14,341 acres not designated wilderness, recreational ORV use would continue.

Exploration for mineral resources would be precluded on the 41,324 acres recommended for wilderness designation. This includes 30 miles of seismic lines along the eastern border of the suitable area. An open pit precious metals mine would be developed in the suitable area including 20 miles of new roads, tailings, waste dumps, heap leach pads and the pit.

The 14,341 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is expected to occur along the western portion resulting in 10 miles of seismic lines.

Wilderness designation would preclude the harvest of woodland products in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 13% (445 trees) and firewood by 5% (350 cords).

All Wilderness Alternative

Under the All Wilderness Alternative, all 55,665 acres of public land in the Bluebell WSA would be recommended suitable for wilderness designation.

Conclusions

Wilderness values of naturalness and opportunities for solitude and primitive recreation would be retained within the Bluebell WSA, except in the Erickson Canyon area and along the immediate vicinity of cherrystem roads and boundary roads.

Recreational ORV use of 480 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

Oil and gas exploration activities in the Bluebell WSA would be foregone. Exploration for precious metals would be foregone. A precious metals open pit mine would be developed in Erickson Canyon.

The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 475 cords of firewood per year would be foregone, reducing the resource area's annual harvest of Christmas trees by 17% and firewood by 7%.

No Wilderness Alternative

Under the proposed action, the entire 55,665 acres of the Bluebell WSA would be recommended nonsuitable for wilderness designation.

Conclusions

The Bluebell WSA's wilderness values of naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be lost due to woodcutting, ORV use and minerals exploration and development.

There would be no impact on recreational ORV use.

There would be no impact on mineral exploration and development in the Bluebell WSA.

There would be no impact on woodland product harvest in the Bluebell WSA.

Alternative A (Partial Wilderness Designation)

Under this alternative Action, 25,830 acres of the Bluebell WSA would be recommended suitable for wilderness designation and 29,835 acres would be recommended nonsuitable for wilderness designation.

Conclusions

The 25,830 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, solitude would be adversely impacted due to continue use of motorized vehicles. Wilderness values that exist in the Erickson Canyon area would be lost on 5000 acres due to the development of an open pit mine.

On the 29,835 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities, and harvest of woodland products.

Recreational ORV use would be eliminated on the 25,830 acres designated wilderness and 120 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 29,835 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 360 visitor days annually for the foreseeable future.

In the 25,830 acres recommended suitable an open pit precious metals mine in the Erickson Canyon area would be developed including 20 miles of new roads, tailings, waste dumps, head leach pads and the pit.

The 29,835 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is expected to result in 40 miles of seismic lines along the western and eastern borders of the WSA.

Harvest of up to 275 Christmas trees and 220 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest for Christmas trees by 8% and for firewood by 3%.

Alternative B (Partial Wilderness Designation)

Under Alternative B, 48,308 acres of the Bluebell WSA would be recommended suitable for wilderness designation and 7,357 acres would be recommended nonsuitable for wilderness designation.

Conclusions

The majority of the 48,308 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, continued motorized vehicle use would impact solitude.

On the 7,357 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities, and harvest of woodland products.

Recreational ORV use would be eliminated on the 48,308 acres designated wilderness and 400 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible.

Exploration for mineral resources would be precluded on the 48,308 acres recommended for wilderness designation. This includes 40 miles of seismic lines along the eastern and western borders of the suitable area. An open pit precious metals mine would be developed in the Erickson Canyon area.

The 7,357 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is not expected to occur in this area.

Harvest of up to 520 Christmas trees and 415 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% and firewood by 6%. Harvest in the nonsuitable area would not be impacted and is expected to reach 80 Christmas trees and 60 cords of firewood annually.

GOSHUTE PEAK WSA (NV-010-033)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 61,004 acres of the Goshute Peak WSA would be recommended suitable for wilderness designation and 8,766 acres would be recommended nonsuitable for wilderness designation.

Conclusions

On the 61,004 acres designated as wilderness naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, continued use of motorized vehicles would adversely impact solitude.

On the 8,766 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities and harvest of woodland products.

Recreational ORV use would be eliminated on the 61,004 acres designated wilderness and 960 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 8,766 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 240 visitor days annually for the foreseeable future.

Exploration for oil and gas would be precluded on the 61,004 acres recommended for wilderness designation. Three miles of seismic lines along the southeastern border of the suitable area would be precluded.

The 8,766 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 12 miles of exploratory access roads and 120 drill pads. Exploration for oil and gas is expected to result in seven miles of seismic lines.

Wilderness designation would preclude the harvest of woodland products in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% (520 trees) and firewood by 10% (670 cords).

All Wilderness Alternative

Under the All Wilderness Alternative, all 69,770 acres of public land in the Goshute Peak WSA would be recommended suitable for wilderness designation.

Conclusions

Wilderness values of naturalness and opportunities for solitude and primitive recreation would be retained in the Goshute Peak WSA, except along cherrystem roads and boundary roads wilderness values would be adversely impacted by motorized access.

Recreational ORV use of 1200 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

There would be impacts to mineral exploration activities in the Goshute Peak WSA. Exploration for precious metals as well as oil and gas would be foregone.

The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 770 cords of firewood per year would be foregone, reducing the resource area's total annual harvest for Christmas trees by 17% and firewood by 11%.

No Wilderness Alternative

Under the proposed action, the entire 69,770 acres of the Goshute Peak WSA would be recommended nonsuitable for wilderness designation.

Conclusions

The Goshute Peak WSA's wilderness values of naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be lost over the long-term due to mineral exploration, woodcutting and ORV use.

There would be no adverse impact on recreational ORV use.

There would be no impact on exploration for mineral resources in the Goshute Peak WSA.

There would be no impact on woodland product harvest in the Goshute Peak WSA.

Alternative A (Partial Wilderness Designation)

Under this alternative, 45,618 acres of the Goshute Peak WSA would be recommended suitable for wilderness designation and 24,152 acres would be recommended nonsuitable for wilderness designation.

Conclusions

On the 45,618 acres designated as wilderness long-term naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads motorized vehicle use would impact solitude.

On the 24,152 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities and harvest of woodland products.

Recreational ORV use would be eliminated on the 45,618 acres designated wilderness and 530 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 24,152 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 670 visitor days annually for the foreseeable future.

There would be no impact to exploration and development of mineral resources.

Harvest of up to 535 Christmas trees and 670 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas tree by 15% and firewood by 10%. Harvest in the nonsuitable area would not be impacted and is expected to reach 65 Christmas trees and 100 cords of firewood annually.

Alternative B (Partial Wilderness Designation)

Under Alternative B, 65,585 acres of the Goshute Peak WSA would be recommended suitable for wilderness designation and 4,185 acres would be recommended nonsuitable for wilderness designation.

Conclusions

The 65,585 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. Solitude along boundary and cherrystem roads would be adversely impacted by continued motorized vehicle use.

On the 4,185 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be lost because of continued recreational ORV use and mineral exploration activities.

Recreational ORV use would be eliminated on the 65,585 acres designated wilderness and 1060 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 4,185 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 140 visitor days annually for the foreseeable future.

Exploration for oil and gas and precious metals would be precluded on the 65,585 acres recommended for wilderness designation. This includes 7 miles of seismic lines and 10 miles of new roads along the southeastern border of the suitable area.

The 4,185 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads, and exploration for oil and gas is expected to result in 3 miles of seismic lines in the southeastern portion of the WSA.

Woodland products available for harvest only occur in the suitable portion of the WSA. Under this alternative all 600 Christmas trees and 770 cords of firewood would be precluded from harvest, reducing the resource area's total annual harvest of Christmas trees by 17% and firewood by 11%.

SOUTH PEQUOP WSA (NV-010-035)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 34,544 acres of the South Pequop WSA would be recommended suitable for wilderness designation and 6,546 acres would be recommended nonsuitable for wilderness designation.

Conclusions

The 34,544 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, motorized use would adversely impact solitude.

On the 6,546 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use and mineral exploration activities.

Recreational ORV use would be eliminated on the 34,544 acres designated wilderness and 130 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 6,546 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 110 visitor days annually for the foreseeable future.

There would be no impacts to exploration or development of mineral resources in the suitable area.

The 6,546 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 10 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is not expected to occur.

Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. In the nonsuitable area there are no woodland products available for harvest.

All Wilderness Alternative

Under the All Wilderness Alternative, all 41,090 acres of public land in the South Pequop WSA would be recommended suitable for wilderness designation.

Conclusions

Naturalness and opportunities for solitude and primitive and unconfined recreation would be maintained in the South Pequop WSA, except along cherrystem roads and boundary roads where uncontrolled motorized access would adversely impact solitude. In the immediate vicinity of closed ways solitude and naturalness would be enhanced.

Recreational ORV use of 240 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

There would be impacts to exploration for precious metals in the South Pequop WSA. Exploration would be foregone, precluding 10 miles of new roads.

The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 400 Christmas trees and 385 cords of firewood per year would be foregone, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%.

No Wilderness Alternative

Under this alternative, the entire 41,090 acres of the South Pequop WSA would be recommended nonsuitable for wilderness designation.

Conclusions

The South Pequop WSA's wilderness values of naturalness and outstanding opportunities for solitude and primitive and unconfined recreation would be lost due to minerals exploration, ORV use and woodcutting.

There would be no impact on recreational ORV use.

There would be no impact on mineral resources activities in the South Pequop WSA.

There would be no impact on woodland product harvest in the South Pequop WSA.

Alternative A (Partial Wilderness Designation)

Under this Alternative, 37,573 acres of the South Pequop WSA would be recommended suitable for wilderness designation and 3,517 acres would be recommended nonsuitable for wilderness designation.

Conclusions

The 37,573 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads motorized vehicle use would adversely impact solitude.

On the 3,517 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, and mineral exploration activities.

Recreational ORV use would be eliminated on the 37,573 acres designated wilderness and 175 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 3,517 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 65 visitor days annually for the foreseeable future.

Exploration for precious metals would be precluded on the 37,573 acres recommended for wilderness designation. Two miles of roads and 4 drill pads in northern portion of the suitable area would be precluded.

The 3,517 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in eight miles of exploratory access roads and 16 drill pads. Exploration for oil and gas is not expected to occur.

Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. Harvest in the nonsuitable area would not occur as there are no harvestable product in this area.

BAD LANDS WSA (NV-010-184)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 8,415 acres of the Bad Lands WSA would be recommended suitable for wilderness designation and 1,011 acres would be recommended nonsuitable for wilderness designation.

Conclusions

The 8,415 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced.

On the 1,011 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use.

Recreational ORV use would be eliminated on the 8,415 acres designated wilderness and 100 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 1,011 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 50 visitor days annually for the foreseeable future.

There would be no impacts to mineral activities as none are projected to occur.

All Wilderness Alternative

Under the All Wilderness Alternative, all 9,424 acres of public land in the Bad Lands WSA would be recommended suitable for wilderness designation.

Conclusions

Wilderness values would be retained on all 9,424 acres of the Bad Lands WSA, except along boundary roads where uncontrolled motorized access would adversely impact solitude. In the immediate vicinity of closed ways naturalness and solitude would be enhanced.

Recreational ORV use of 50 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

There would be no impacts to mineral activities in the Bad Lands WSA.

No Wilderness Alternative

Under the proposed action, the entire 9,424 acres of the Bad Lands WSA would be recommended nonsuitable for wilderness designation.

Conclusions

The Bad Lands WSA's wilderness values of naturalness, and outstanding opportunities for solitude would be reduced on the long-term.

There would be no impact on recreational ORV use.

There would be no impact on mineral resources activities in the Bad Lands WSA.

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CHAPTER 1

INTRODUCTION AND PLANNING PROCESS

PURPOSE AND NEED

The purpose of the Proposed Action is to manage and preserve the wilderness characteristics on 145,287 BLM acres and continue to manage 30,664 BLM acres for uses other than wilderness. These acreages represent portions of the Bluebell, Goshute Peak, South Pequop and Bad Lands Wilderness Study Areas (WSAs) in Elko County, Nevada.

The Federal Land Policy and Management Act of 1976 (FLPMA) directs the Bureau of Land Management (BLM) to manage the public lands and their resources under the principles of multiple use and sustained yield. Section 603 of FLPMA requires a wilderness review of BLM roadless areas of 5,000 or more acres and roadless islands. The BLM inventory process identified WSAs which have the mandatory wilderness characteristics of size, naturalness, and opportunities for solitude and/or primitive recreation. Suitable or nonsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior. The President will then make recommendations to the Congress. Areas can be designated wilderness only by an act of Congress. If designated as wilderness, an area would be managed in accordance with the Wilderness Act of 1964 and the Bureau's Wilderness Management Policy dated September, 1981.

The four WSAs being studied are covered by the Wells Area Resource Management Plan and are listed in Table 1-1 below.

TABLE 1-1

LIST OF WILDERNESS STUDY AREAS

WSA Name	Number	Acreage	County
Bluebell	NV-010-027	55,665	Elko
Goshute Peak	NV-010-033	69,770	Elko
South Pequop	NV-010-035	41,090	Elko
Bad Lands	NV-010-184	9,426	Elko

LOCATION

The WSAs are located in northeastern Nevada in the BLM's Wells Resource Area of the Elko District. Map 1-1 shows the relative location of the Wells Resource Area within the State of Nevada. Map 1-2 displays the location of the four WSAs within the resource area.

WILDERNESS REVIEW

Inventory

The inventory phase identified areas with wilderness characteristics, as defined in the Wilderness Act of 1964, and identified them for designation as WSAs. Guidelines for conducting the inventory phase were set forth primarily in the BLM's "Wilderness Inventory Handbook" of 1978.

Areas under consideration as wilderness are evaluated for the features described below:

Wilderness Values

The following key factors are considered when roadless areas with wilderness characteristics are identified:

Size: The area must have at least 5,000 contiguous roadless acres of public land.

Naturalness: Human imprints must be substantially unnoticeable.

Outstanding opportunities: The area must offer either an outstanding opportunity for solitude or an outstanding opportunity for primitive and unconfined recreation.

During wilderness inventory, the BLM also considers the extent to which each of the following wilderness values is present:

Special Features: Ecological, geological or other features of scientific, educational, scenic or historic value.

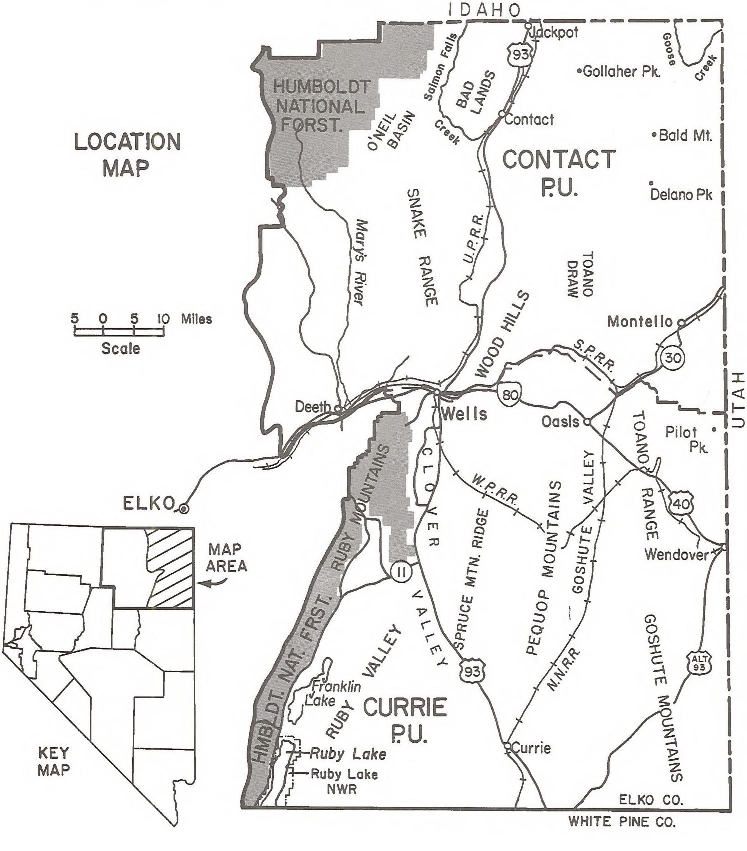
Multiple Resource Benefits: The benefits to other multiple resource values and uses that only wilderness designation could ensure.

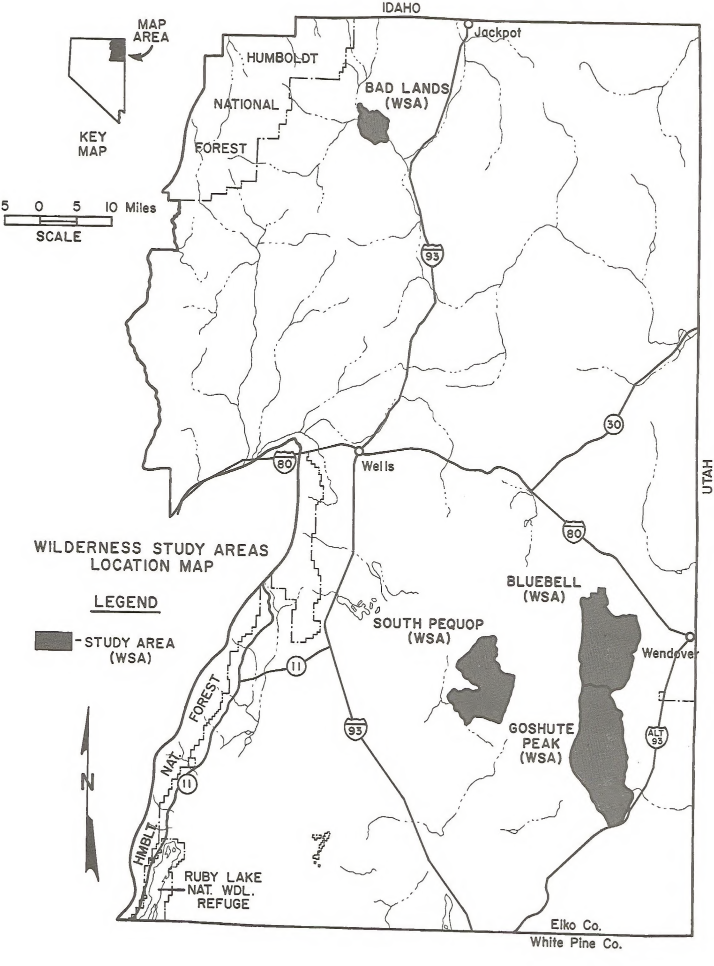
Diversity in the National Wilderness Preservation System (NWPS)

Also to be considered are the following elements of diversity in the NWPS:

Ecosystem and Landforms: Whether natural systems and features, as represented by ecosystems and landforms, are represented elsewhere in the region or in the NWPS.

WELLS PLANNING AREA
ELKO DISTRICT NEVADA





WILDERNESS STUDY AREAS LOCATION MAP

Nearness to Population Centers: The opportunities for solitude or primitive recreation within a day's drive of major population centers.

Geographic Distribution: A balance of geographic distribution of wilderness areas--how many designated wilderness areas are in the same geographic area?

Manageability

In evaluating a WSA, the BLM also must consider whether the area is capable of being effectively managed to preserve its wilderness character over the long-term.

Study

During the study phase, the BLM determines through careful analysis which study areas will be recommended as suitable for wilderness designation and which will not. Recommendations for the four areas being studied for wilderness are being made through the BLM's multiple use resource planning process. The BLM's planning regulations and its final wilderness study policy guided the study process.

Reporting

The reporting phase begins after completion of the draft resource management plan/environmental impact statement (RMP/EIS), when a wilderness study report (WSR) and a preliminary final wilderness EIS are prepared to address the results of the study and make the preliminary recommendations as to designation or nondesignation of each WSA.

All recommendations of WSAs as suitable or nonsuitable for designation as wilderness will be reported through the Director of the BLM to the Secretary of the Interior, and through the Secretary of the Interior to the President, who will make his recommendation to Congress. Only Congress can designate an area as wilderness.

INTERIM MANAGEMENT

Until Congress acts, the BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review (1979; rev. 1983) serves as the principal document for managing the four WSAs in the Wells Resource Area. The goal of the interim management policy is to ensure that the wilderness qualities inherent to each WSA are unchanged at the time that Congress makes the final decisions.

SCOPING

The scoping process for the Wells Wilderness EIS encompassed issues identified by the BLM staff; by the public at public meetings during the initial issues/planning criteria phase (March and April, 1979); by contacts with state and local governments and various user and interest groups (November, 1979);

by solicitation of comments through two Federal Register notices (May, 1980 and August, 1983); by comments received as a result the distribution of the draft version of issues and planning criteria via the local newspaper, mailing lists and newsletters (January, 1981); at workshops held in Reno, Elko and Wells, Nevada (September, 1982); from written comments on the draft Wells Resource Management Plan/EIS by the public and federal, state and local agencies (May 20, 1983 to August 19, 1983); and at two public hearings in Reno and Wells, Nevada (June 1983). During the scoping period the United States Fish and Wildlife Service was consulted concerning the potential effects of wilderness designation on threatened or endangered species. The environmental issues identified for analysis in this EIS follow. The issues apply to all WSAs unless specifically noted otherwise.

1. Impacts on Wilderness Values. The wilderness values of naturalness, outstanding opportunities for solitude, outstanding opportunities for primitive and unconfined recreation and various special features of the WSA would benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSAs not be designated wilderness. These impacts are an issue for analysis in the EIS.

2. Impacts on Recreational Off-Road Vehicle Use. Wilderness designation would eliminate the use of recreational off-road vehicles (ORVs) in the WSAs. Eliminating this use would affect the availability of opportunities for ORV recreation and shift ORV uses currently occurring in the WSAs to adjacent lands. The impact of wilderness designation on recreational ORV use is an issue for analysis in the EIS.

3. Impacts on Development of Mineral Resources. Wilderness designation would affect the development of potential and known mineral resources by withdrawing designated lands from mineral entry. Development of existing mineral resources within designated wilderness areas could be affected by wilderness management restrictions. The impact of wilderness designation on the development of potential and known mineral resources is an issue for analysis in the EIS.

4. Impacts on Woodland Product Harvest. Wilderness designation would continue the policy of not allowing commercial or private harvest of firewood or fence posts. The impact of forgoing the harvest of this resource is an issue for analysis in the EIS for the Bluebell, Goshute Peak and South Pequop WSAs. There are no forest resources in the Bad Lands WSA.

The following issues were identified in scoping but were not selected for detailed analysis in this EIS because they were minor or irrelevant to the analysis of environmental issues which would be significant to the decision process. The reasons for setting each of the issues aside are discussed below.

1. Impacts on Wildlife. Many comments during scoping and on the Draft RMP expressed a general concern for wildlife without identifying specific issues associated with key wildlife or major habitats (other than those identified above). An issue dealing with wildlife in the general was considered too academic and unuseful to be included in this EIS. No

specific impacts on populations or the habitat of any specific species were identified by public input to the scoping process. Also, based on the projections of development in the four WSAs, little or no change in wildlife populations or habitat is anticipated with wilderness designation or nondesignation.

2. Impact on Visitor Safety. Concern was stated by some, that wilderness designation would encourage recreationists to use areas they otherwise wouldn't use because the areas are labeled wilderness. This would result in inexperienced recreationists being exposed to hazards they are not experienced in handling. This issue was not analyzed because hazards associated with recreation use on the WSAs would not be affected by wilderness designation. The hazards would be the same regardless of the area's status.

3. Economic Impact on Livestock Operations. Concerns were raised that livestock operators could be required to modify their operations within designated wilderness areas in a manner that would have significant adverse economic impacts on their business. This issue was considered but dropped from detailed analysis because the BLM's Wilderness Management Policy provides for the continued use of wilderness areas for livestock operations at historic levels.

   Although the management practices of livestock operators in the four WSAs would be more regulated, livestock grazing operations would continue as they did prior to wilderness designation subject to reasonable controls.

4. Impacts on Grazing Facility Maintenance and Construction. Maintenance of existing rangeland improvements would continue to be allowed in wilderness areas, subject to reasonable controls over the techniques of maintenance. The impacts resulting from wilderness designation would be minor economic impacts rather than environmental impacts, and this issue was dropped from further consideration. In addition, no new rangeland improvements are planned or projected for construction.

5. Impact on Cultural Resources. No cultural sites that would be eligible for nomination for listing on the National Register of Historic Places are known to exist within any of the WSAs. Since highly significant cultural sites are not known to exist within the WSAs, the issue of impact to cultural resources was dropped from further analysis.

6. Impacts on Military Overflights. During EIS development, the U.S. Air Force raised concerns pertaining to the effect wilderness designation would have on low-level military overflights. The Wilderness Management Policy states "Where low (military) overflight is a problem, or expected to become a problem, wilderness management plans will provide for liaison with proper military authorities, the Federal Aviation Administration, and contact with pilots in the general area in an effort to reduce low flight."; therefore, this issue was not analyzed in the EIS.

7. Impacts on Domestic Sheep Grazing. One response to the draft RMP/EIS raised a concern that the impact analysis in the RMP indicated wilderness designation would affect levels of domestic sheep grazing in the Goshute WSA. Various grazing levels were identified for impact analysis for the alternatives, however, these levels were independent of the wilderness recommendations. The Bureau's Wilderness Management Policy provides for the continued use of wilderness areas for livestock operations at historic levels; therefore, this issue was not analyzed in the EIS.

8. Impacts of Visitor Use on Bad Lands WSA. One comment received during scoping expressed the concern that the Bad Lands WSA is two small to manage both for visitor use and provide a worthwhile wilderness experience to more than a few people. Manageability is a concern but not an environmental issue and, therefore, was not considered for analysis in the EIS.

9. Impacts of Visitor Use on Bighorn Sheep. One concern expressed during scoping was that adding more people as the result of wilderness designation would conflict with bighorn sheep. Visitor use of the WSA is expected to continue to increase with or without wilderness designation, therefore, impacts of increased visitor use on bighorn sheep would occur with or without wilderness designation. This issue was not considered for analysis in the EIS.

10. Impacts on Bighorn Sheep Reintroduction. Wilderness designation would provide added protection to historic bighorn sheep habitat in the Bluebell, Goshute Peak and Bad Lands WSAs by precluding activities which would adversely affect the habitat. However, there were no surface disturbing or any other activities identified or projected to occur which would impact the critical habitat or the species, and this issue was dropped from further consideration in the EIS.

11. Impacts on Bald Eagle Wintering Habitat. The Goshute WSA contains a known bald eagle roost site. This species is listed by the U.S. Fish and Wildlife Service as endangered. Wilderness designation would preclude surface disturbing activities which would impact roosting and hunting habitat. However, there were no surface disturbing or any other activities identified or projected to occur which would impact the critical habitat or the species, and this issue was dropped from further consideration in the EIS.

12. Impact on Diversity within the National Wilderness Preservation System. The issue of how wilderness designation would impact ecologic diversity within the NWPS was not analyzed as an environmental issue since it was previously considered in inventory and planning phases of the wilderness study process. Since all potential natural vegetation types within the WSAs are currently represented in the NWPS, designation of these WSAs as wilderness would not expand ecologic diversity of the system.

The following is an issue that was frequently identified during scoping. Since it is not an environmental issue, but is a program concern, it was dropped from further consideration in the EIS.

> The WSAs being studied are not what Congress intended to be included in the National Wilderness Preservation System. Some or all of the areas being studied for wilderness designation may not be the kind of area Congress intended to have considered for wilderness. This issue was dropped since it was determined in the inventory stage of the BLM's wilderness review process that all the WSAs being studied meet the minimum standards for wilderness identified by the Congress in the Wilderness Act of 1964 and FLPMA of 1976.

THE PLANNING PROCESS, SELECTION OF THE PROPOSED ACTION, AND DEVELOPMENT OF ALTERNATIVES

The Planning Process and Selection of the Proposed Action

Development of the Proposed Action is guided by requirements of the Bureau's Planning Regulations, 43 Code of Federal Regulations (CFR), part 1600. The BLM's Wilderness Study Policy (published February 3, 1982, in the Federal Register) supplements the planning regulations by providing the specific factors to be considered in developing suitability recommendations during the planning sequence.

The Proposed Action recommends as suitable for wilderness designation those WSAs, or portions of WSAs, with high quality wilderness values. In addition, the Proposed Action would limit conflicts between the wilderness resource and livestock use, recreational ORV use, and development of known gold, silver, or other precious metal mineral resources. Under the Proposed Action, 159,881 acres would be recommended suitable for wilderness designation in four WSAs. See Table 1-2 for a breakdown of suitable and nonsuitable acreage of the Proposed Action for each WSA.

Alternatives to the Proposed Action Selected for Analysis

The BLM Wilderness Study Policy calls for the formulation and evaluation of alternatives ranging from all wilderness to no wilderness. The alternatives analyzed in this EIS include: (1) a No Wilderness Alternative for each WSA; (2) an All Wilderness Alternative for each WSA and; (3) a Partial Wilderness Alternative(s) for all four WSAs. See Table 1-2 for a breakdown, by WSA, of the alternatives and respective suitable and nonsuitable acreages.

In this document, the No Action Alternative, as required by the National Environmental Protection Act, and the No Wilderness Alternative are equivalent. Both advocate continuation of management as outlined in the existing RMP and recommend the WSAs as nonsuitable for wilderness.

The All Wilderness Alternative represents the maximum possible acreage that could be recommended as suitable for wilderness designation.

Partial wilderness alternatives can contain suitable or nonsuitable recommendations ranging between the All Wilderness and No Action Alternatives. A partial wilderness alternative recommend as suitable for wilderness designation something less than the entire acreage of one WSA.

Alternatives Considered But Dropped From Further Analysis

The alternatives analyzed in this EIS represent all alternatives considered.

Alternative Name Changes From the Draft Wells RMP/EIS

In an effort to simplify the EIS format and develop a more readable document, names of alternatives have been changed from the draft RMP/EIS. See Table 1-2 for a description of these name changes.

In addition, the Proposed Action, which was previously referred to as the Preferred Alternative, described in this document has been revised. Public comment and the Governor's Consistency Review resulted in the following modifications to reduce conflicts with potential mineral development:

	Previous Preferred Alternative Acres		Revised Preferred Alterntive Acres	
WSA	Preliminarily Suitable	Nonsuitable	Preliminarily Suitable	Nonsuitable
Bluebell	48,308	7,357	41,324	14,341
Goshute Peak	65,585	4,185	61,004	8,766
South Pequop	37,573	3,517	34,544	6,546
Bad Lands	8,415	1,011	8,415	1,011
TOTALS	159,881	16,070	145,287	30,664

Table 1-2
ALTERNATIVES BY WSA

Final EIS WSA/ALTERNATIVE	Draft RMP/EIS Alternative Names	Suitable Acres	Nonsuitable Acres
BLUEBELL			
Proposed Action (Partial)		41,324	14,341
All Wilderness	Resource Protection	55,665	0
No Wilderness	No Action	0	55,665
Alternative A (Partial)	Resource Production	25,830	29,834
Alternative B (Partial)	Preferred/Midrange	48,308	7,357
GOSHUTE PEAK			
Proposed Action (Partial)		61,004	8,766
All Wilderness	Resource Protection	69,770	0
No Wilderness	No Action	0	69,770
Alternative A (Partial)	Resource Production	45,618	24,152
Alternative B (Partial)	Preferred/Midrange	65,585	4,185
SOUTH PEQUOP			
Proposed Action (Partial)		34,544	6,546
All Wilderness	Resource Protection	41,090	0
No Wilderness	Resource Production/ No Action	0	41,090
Alternative A	Preferred/Midrange	37,573	3,517
BAD LANDS			
Proposed Action (Partial)	Preferred/Midrange	8,415	1,011
All Wilderness	Resource Protection	9,426	0
No Wilderness	Resource Production/ No Action	0	9,426

CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions within the WSAs cannot be predicted with certainty, assumptions were made to allow the analysis of impacts under the Proposed Action and alternatives. These assumptions are the basis of the impacts identified in this EIS. They are not management plans or proposals, but represent feasible patterns of activities which could occur under the alternatives analyzed.

BLUEBELL WSA (NV-010-027)

Proposed Action (Partial Wilderness)

A portion of the Bluebell WSA, 41,324 acres, would be recommended as suitable for wilderness designation. The remaining 14,341 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bluebell WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,340 animal unit months (AUMs) for cattle and sheep for the forseeable future. Seven small earthern reservoirs would be maintained in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 41,324 acre parcel recommended as suitable for wilderness designation, including 13 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 310 visitor days of ORV use that is projected to occur annually in the area.

The 14,341 acre parcel recommended nonsuitable would remain open to recreational ORV use including 7 miles of ways and 2 miles of new roads associated with mining exploration. Projections indicate that recreational ORV use in this area would increase to 170 visitor days annually for the forseeable future.

Other Recreation

The 41,324 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,500 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 41,324 acres of the Bluebell WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which have plans of operation have been filed.

Under this alternative, an open pit precious metals mine is expected to occur in the Erickson Canyon area resulting in 300 acres of surface disturbance. Activities associated with the mine include 4 miles of new road construction, tailings, waste dumps, heap leach pads and the pit.

Exploration for oil and gas would be precluded including 30 miles of seismic lines.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

In the 14,341 acre parcel recommended nonsuitable it is anticipated exploration for precious metals will occur in the southwestern and northeastern portions, resulting in 2 miles of new roads and 20 drill pads disturbing approximately 4 acres. Development is not expected. Oil and gas exploration is anticipated to occur along the western portion of the nonsuitable area resulting in 10 miles of seismic lines.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

Woodland Product Harvest

The Bluebell WSA contains approximately 600 Christmas trees and 475 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under the Proposed Action, 41,324 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 445 Christmas trees and 350 cords of firewood annually.

The 14,341 acre parcel recommended nonsuitable would be open to harvesting woodland products and would provide an annual supply of 155 Christmas trees and 125 cords of firewood.

All Wilderness

The entire Bluebell WSA, 55,665 acres, would be recommended as suitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bluebell WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,340 animal unit months (AUMs) for cattle and sheep for the forseeable future. Ten small earthern reservoirs would continue to be maintained. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 20 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 480 visitor days of ORV use that is estimated to occur annually in the area. Approximately 8 miles of cherrystem roads would remain open for motorized access into the WSA.

Other Recreation

The entire WSA would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,500 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the entire Bluebell WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which have plans of operation have been filed.

Under this alternative, exploration for precious metals and oil and gas would be precluded. Four miles of roads and 30 miles of seismic lines would be foregone. An open pit precious metals mine is anticipated in the Erickson Canyon area, resulting in 300 acres of surface disturbance.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

Woodland Product Harvest

The Bluebell WSA contains approximately 600 Christmas trees and 475 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under the Proposed Action, all 55,665 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 600 Christmas trees and 475 cords of firewood annually.

No Wilderness

The entire Bluebell WSA, 55,665 acres, would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bluebell WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,340 animal unit months (AUMs) for cattle and sheep for the forseeable future. Ten small earthern reservoirs would continue to be maintained. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 20 miles of vehicle ways, 8 miles of cherrystem roads and 6 miles of new roads associated with mining, would be open to recreational ORV use. Recreational ORV use is projected to reach 480 visitor days annually.

Other Recreation

Other recreational activities, including hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting would continue to be available. Recreational use for all activities is expected to increase to 600 visitor days annually for the forseeable future.

Mineral Resources Actions

The entire Bluebell WSA would be open to all forms of appropriation under the mining and mineral leasing laws. Validity examinations would not be conducted.

Exploration for precious metals is expected to occur in the southwest and northeast portions of the WSA resulting in 2 miles of new roads and 20 drill pads. No development is anticipated. A precious metals open pit mine is anticipated in the Erickson Canyon area, with an estimated 300 acres of surface disturbance taking place. Development would include 4 miles of roads, tailings, waste dumps and leach pads.

Oil and gas exploration is expected to occur on the western and eastern borders of the WSA, resulting in 40 miles of seismic lines. Development is not expected.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

Woodland Product Harvest

The Bluebell WSA contains approximately 600 Christmas trees and 475 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under the No Wilderness Alternative, the entire WSA would be available for harvesting woodland products, making available the harvest of 600 Christmas trees and 475 cords of firewood annually.

Alternative A (Partial Wilderness)

A portion of the Bluebell WSA, 25,830 acres, would be recommended as suitable for wilderness designation. The remaining 29,835 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bluebell WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,340 animal unit months (AUMs) for cattle and sheep for the forseeable future. One small earthern reservoir would continue to be maintained in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 25,830 acre parcel recommended as suitable for wilderness designation, including 5 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 120 visitor days of ORV use that is estimated to occur annually in the area. Approximately 5 miles of cherrystem roads leading into the WSA would be open to motorized vehicles.

The 29,835 acre parcel recommended nonsuitable would remain open to recreational ORV use including 15 miles of ways. Projections indicate that recreational ORV use in this area would increase to 360 visitor days annually for the forseeable future.

Other Recreation

The 25,830 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 25,830 acres of the Bluebell WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, an open pit precious metals mine is anticipated to occur in the Erickson Canyon area, resulting in a surface disturbance of 300 acres.

In the 29,835 acre parcel recommended nonsuitable it is anticipated exploration for precious metals in the southwest and northeast portions of the WSA will result in 2 miles of new roads and 20 drill pads disturbing approximately 4 acres. Development is not expected.

Oil and gas exploration is expected to occur on the western and eastern borders of the WSA, resulting in 40 miles of seismic lines. Development is not expected.

It is not anticipated that the high grade limestone will be developed in any portion of the WSA. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

Woodland Product Harvest

The Bluebell WSA contains approximately 600 Christmas trees and 475 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under this alternative 25,830 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 275 Christmas trees and 220 cords of firewood annually.

The 29,835 acre parcel recommended nonsuitable would be open to harvesting woodland products and would provide an annual supply of 325 Christmas trees and 255 cords of firewood.

Alternative B (Partial Wilderness)

A portion of the Bluebell WSA, 48,308 acres, would be recommended as suitable for wilderness designation. The remaining 7,357 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bluebell WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,340 animal unit months (AUMs) for cattle and sheep for the forseeable future. Seven small earthern reservoirs would be maintained in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 48,308 acre parcel recommended as suitable for wilderness designation, including 17 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 400 visitor days of ORV use that is projected to occur annually in the area. Approximately 8 miles of cherrystem roads leading into the WSA would remain open for motorized access.

The 7,357 acre parcel recommended nonsuitable would remain open to recreational ORV use including 3 miles of ways. Projections indicate that recreational ORV use in this area would increase to 80 visitor days annually for the forseeable future.

Other Recreation

The 48,308 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,500 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 48,308 acres of the Bluebell WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, an open pit precious metals mine is anticipated to occur in the Erickson Canyon area, resulting in 300 acres of surface disturbance. Designation would preclude construction of one mile of road associated with exploration for precious metals in the southwest portion of the suitable area.

Exploration for oil and gas would be precluded including 40 miles of seismic lines.

In the 7,357 acre parcel recommended nonsuitable it is anticipated exploration for precious metals will result in one mile of new road and 20 drill pads disturbing approximately 4 acres. Development is not expected.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

Woodland Product Harvest

The Bluebell WSA contains approximately 600 Christmas trees and 475 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under the Alternative B, 48,308 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 520 Christmas trees and 415 cords of firewood annually.

The 7,357 acre parcel recommended nonsuitable would be open to harvesting woodland products and would provide an annual supply of 80 Christmas trees and 60 cords of firewood.

Summary of Impacts

Table 2-1 summarizes the impacts of the Alternatives for the Bluebell WSA.

TABLE 2-1

SUMMARY OF IMPACTS
BLUEBELL WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A	Alternative B
Impact on Wilderness Values	On the 41,324 acres designated as wilderness, naturalness, solitude and opportunities for primitive and unconfined recrea- would be maintained except in the Erickson Canyon area. An open pit mine in the Erickson Canyon area would result in the loss of naturalness on 300 acres due to surface disturbance associated with the mining operation. Sights and sounds from the mining operation would result in the loss of solitude on 5,000 acres. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads solitude would be locally impacted by vehicle travel. On the 14,341 acres not designated as wilderness, naturalness would be lost on 22 acres due to 2 miles of mining exploration roads (3 acres) and 10 miles of seismic lines (10 acres). Naturalness and opportunities for solitude would be lost over a 2,400 acre area due to harvesting of Christmas trees and firewood.	Wilderness values of naturalness and opportunities for solitude and primitive recreation would be retained within the Bluebell WSa, except in the Erickson Canyon area and along the immediate vicinity of cherrystem roads and boundary roads.	The Bluebell WSA's wilderness values of naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be lost due to woodcutting, ORV use and minerals exploration and development.	The 25,830 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, solitude would be adversely impacted due to continue use of motorized vehicles. Wilderness values that exist in the Erickson Canyon area would be lost on 5,000 acres due to the development of an open pit mine. On the 29,835 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities, and harvest of woodland products.	The majority of the 48,308 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, continued motorized vehicle use would impact solitude. On the 7,357 areas managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities, and harvest of woodland products.

TABLE 2-1 (Cont.)

SUMMARY OF IMPACTS
BLUEBELL WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A	Alternative B
Impact on Recreational ORV Use	Recreational ORV use would be eliminated on the 41,324 acres designated wilderness and 310 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible. On the 14,341 acres not designated wilderness, recreational ORV use would continue.	Recreational ORV use of 480 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible.	There would be no impact on recreational ORV use.	Recreational ORV use would be eliminated on the 25,830 acres designated wilderness and 120 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible. On the 29,835 acres not designated wilderness, recreational ORV use would continue to increase but not exceed 360 visitor days annually for the foreseeable future.	Recreational ORV use would be eliminated on the 48,308 acres designated wilderness and 400 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.
Impact on Development of Mineral Resources	Exploration for mineral resources would be precluded on the 41,324 acres recommended for wilderness designation. This includes 30 miles of seismic lines along the eastern border of the suitable area. An open pit precious metals mine would be developed in the suitable area including 20 miles of new roads, tailing, waste dumps, heap leach pads and the pit.	Oil and gas exploration activities in the Bluebell WSA would be foregone. Exploration for precious metals would be foregone. A precious metals open pit mine would be developed in Erickson Canyon.	There would be no impact on mineral exploration and development in the Bluebell WSA.	In the 25,830 acres recommended suitable an open pit precious metals mine in the Erickson Canyon area would be developed including 20 miles of new roads, tailings, waste dumps, heap leach pads & the pit. The 29,835 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is expected to result in 40 miles of seismic lines along the western and eastern borders of the WSA.	Exploration for mineral resources would be precluded on the 48,308 acres recommended for wilderness designation. This includes 40 miles of seismic lines along the eastern and western borders of the suitable area. An open pit precious metals mine would be developed in the Erickson Canyon area. The 7,357 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is not expected to occur in this area.

TABLE 2-1 (Cont.)

SUMMARY OF IMPACTS
BLUEBELL WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A	Alternative B
Impact on Woodland Product Harvest	Wilderness designation would preclude the harvest of woodland products in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 13% (445 trees) and firewood by 5% (350 cords).	The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 475 cords of firewood per year would be foregone, reducing the resource area's annual harvest of Christmas trees by 17% and firewood by 7%.	There would be no impact on woodland product harvest in the Bluebell WSA.	Harvest of up to 275 Christmas trees and 220 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest for Christmas trees by 8% and for firewood by 3%.	Harvest of up to 520 Christmas trees and 415 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% and firewood by 6%. Harvest in the non-suitable area would not be impacted and is expected to reach 80 Christmas trees and 60 cords of firewood annually.

GOSHUTE PEAK WSA (NV-010-033)

Proposed Action (Partial Wilderness)

A portion of the Goshute Peak WSA, 61,004 acres, would be recommended as suitable for wilderness designation. The remaining 8,766 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Goshute Peak WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 5,593 animal unit months (AUMs) for cattle and sheep for the forseeable future. One mile of fence, one developed spring and a corral would continue to be maintained in the portion recommended suitable for wilderness designation. Motorized access to maintain these projects would be controlled. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 61,004 acre parcel recommended as suitable for wilderness designation, including 21 miles of vehicle ways, would be closed to recreational ORV use. A one-mile cherrystem road would remain open for motorized access. This would eliminate approximately 960 visitor days of ORV use that is projected to occur annually in the area.

The 8,766 acre parcel recommended nonsuitable would remain open to recreational ORV use including 6 miles of ways. Projections indicate that recreational ORV use in this area would increase to 240 visitor days annually for the forseeable future.

Other Recreation

The 61,004 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 3,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 61,004 acres of the Goshute Peak WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which have plans of operation have been filed.

Under this alternative, no exploration or development of precious metals is expected to occur in the suitable portion of the WSA due to the low potential for occurrance.

Oil and gas exploration would be foregone including 10 miles of seismic lines.

In the 8,766 acre parcel recommended nonsuitable it is anticipated exploration for precious metals will occur in the northeast and southwest portions of the WSA resulting in 12 miles of new roads and 20 drill pads disturbing approximately 120 acres. Development is not expected.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

Woodland Product Harvest

The Goshute Peak WSA contains approximately 600 Christmas trees and 770 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under the Proposed Action, 61,004 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 520 Christmas trees and 670 cords of firewood annually.

The 8,766 acre parcel recommended nonsuitable would be open to harvesting woodland products and would provide an annual supply of 80 Christmas trees and 100 cords of firewood.

All Wilderness

The entire Goshute Peak WSA, 69,770 acres, would be recommended as suitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Goshute Peak WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 5,593 animal unit months (AUMs) for cattle and sheep for the forseeable future. A one-mile fence, one developed spring and a corral would be maintained in the WSA with controls on motorized access. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 27 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 1200 visitor days of ORV use that is estimated to occur annually in the area. A one-mile cherrystem road would continue to be open to motorized access.

Other Recreation

The entire WSA would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 3,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the entire Goshute Peak WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the WSA. Twelve miles of exploration roads for precious metals and 10 miles of seismic lines would be foregone.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

Woodland Product Harvest

The Goshute Peak WSA contains approximately 600 Christmas trees and 770 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under this alternative, the entire WSA would not be available for harvesting woodland products, precluding the harvest of 600 Christmas trees and 770 cords of firewood annually.

No Wilderness

The entire Goshute Peak WSA, 69,770 acres, would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Goshute Peak WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 5,593 animal unit months (AUMs) for cattle and sheep for the forseeable future. Maintenance of projects by motorized access will continue as in the past. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 27 miles of vehicle ways, a one mile cherrystem road and 12 miles of new roads associated with mining exploration would be open to recreational ORV use.

Other Recreation

The entire WSA would be available for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for all activities is expected to increase to 1,500 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the entire Goshute Peak WSA would be open to all forms of appropriation under the mining and mineral leasing laws. Validity examinations would not be conducted.

Under this alternative, exploration for precious metals is expected to occur in the northwest and southeast portions of the WSA. An estimated 20 acres of surface disturbance is anticipated to occur as the result of 12 miles of road construction and 120 drill pads. Development is not expected.

Exploration for oil and gas is expected to occur along the western edge of the WSA, resulting in 10 miles of seismic lines. Development is not anticipated.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

Woodland Product Harvest

The Goshute Peak WSA contains approximately 600 Christmas trees and 770 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future. Under this alternative all woodland products would be available for harvest.

Alternative A (Partial Wilderness)

A portion of the Goshute Peak WSA, 45,618 acres, would be recommended as suitable for wilderness designation. The remaining 24,152 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Goshute Peak WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 5,593 animal unit months (AUMs) for cattle and sheep for the forseeable future. There are no existing projects in the portion recommended suitable for wilderness designation, and no projects are planned.

Recreational Off-Road Vehicle Use

The 45,618 acre parcel recommended as suitable for wilderness designation, including 12 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 530 visitor days of ORV use that is estimated to occur annually in the area.

The 24,152 acre parcel recommended nonsuitable would remain open to recreational ORV use including 15 miles of ways and 12 miles of new mining roads. Projections indicate that recreational ORV use would increase to 670 visitor days annually for the forseeable future.

Other Recreation

The 24,152 acre parcel recommended as suitable for wilderness designation would be available for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 2,400 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 24,152 acres of the Goshute Peak WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the suitable portion of the WSA.

In the 24,152 acre parcel recommended nonsuitable it is anticipated exploration for precious metals will result in 12 miles of new roads and 20 drill pads disturbing approximately 20 acres. Development is not expected.

Exploration for oil and gas is expected to result in 10 miles of seismic lines.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

Woodland Product Harvest

The Goshute Peak WSA contains approximately 600 Christmas trees and 770 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under Alternative A, 45,618 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 535 Christmas trees and 670 cords of firewood annually.

The 24,152 acre parcel recommended nonsuitable would be open to harvesting woodland products and would provide an annual supply of 65 Christmas trees and 100 cords of firewood.

Alternative B (Partial Wilderness)

A portion of the Goshute Peak WSA, 65,585 acres, would be recommended as suitable for wilderness designation. The remaining 4,185 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Goshute Peak WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 5,593 animal unit months (AUMs) for cattle and sheep for the forseeable future. A one-mile fence, one developed spring and a corral would be maintained with controls on motorized access in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 65,585 acre parcel recommended as suitable for wilderness designation, including 24 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 1060 visitor days of ORV use that is estimated to occur annually in the area.

The 4,185 acre parcel recommended nonsuitable would remain open to recreational ORV use including 3 miles of ways and 10 miles of new roads associated with mining exploration. Projections indicate that recreational ORV use would increase to 140 visitor days annually for the forseeable future.

Other Recreation

The 65,585 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 3,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 65,585 acres of the Goshute Peak WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, wilderness designation would preclude 2 miles of new road construction precious metals and seven miles of seismic lines associated with oil and gas exploration.

In the 4,185 acre parcel recommended nonsuitable it is anticipated exploration for precious metals will result in 10 miles of new roads and 100 drill pads disturbing approximately 16 acres. Development is not expected.

It is not anticipated that the high grade limestone will be developed. Sufficient quantities of limestone are available outside the WSA and closer to the rail lines.

Woodland Product Harvest

The Goshute Peak WSA contains approximately 600 Christmas trees and 770 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under this alternative, no woodland products would be available for harvest. The nonsuitable portion of the WSA does not contain woodland products for harvest.

TABLE 2-2

SUMMARY OF IMPACTS
GOSHUTE PEAK WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A	Alternative B
Impact on Wilderness Values	On the 61,004 acres designated as wilderness naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, continued use of motorized vehicles would adversely impact solitude. On the 8,766 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities and harvest of woodland products.	Wilderness values of naturalness and opportunities for solitude and primitive recreation would be retained in the Goshute Peak WSA, except along cherrystem roads and boundary roads wilderness values would be adversely impacted by motorized access.	The Goshute Peak WSA's wilderness values of naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be lost over the long-term due to mineral exploration, woodcutting and ORV use.	On the 45,618 acres designated as wilderness long-term naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads motorized vehicle use would impact solitude. On the 24,152 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities and harvest of woodland products.	The 65,585 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. Solitude along boundary and cherrystem roads would be adversely impacted by continued motorized vehicle use. On the 4,185 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be lost because of continued recreational ORV use and mineral exploration activities.
Impact on Recreational ORV Use	Recreational ORV use would be eliminated on the 61,004 acres designated wilderness and 960 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible. On the 8,766 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 240 visitor days annually for the foreseeable future.	Recreational ORV use of 1200 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible.	There would be no adverse impact on recreational ORV use.	Recreational ORV use would be eliminated on the 45,618 acres designated wilderness and 530 visitor days would be foregone annually. Impacts of shifting this use to other public lands would be negligible. On the 24,152 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 670 visitor days annually for the foreseeable future.	Recreational ORV use would be eliminated on the 65,585 acres designated wilderness and 1060 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible. On the 4,185 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 140 visitor days annually for the foreseeable future.

TABLE 2-2

SUMMARY OF IMPACTS
GOSHUTE PEAK WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A	Alternative B
Impact on Development of Mineral Resources	Exploration for oil and gas would be precluded on the 61,004 acres recommended for wilderness designation. Three miles of seismic lines along the southeastern border of the suitable area would be precluded. The 8,766 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 12 miles of exploratory access roads and 120 drill pads. Exploration for oil and gas is expected to result in seven miles of seismic lines.	There would be impacts to mineral exploration activities in the Goshute Peak WSA. Exploration for precious metals as well as oil and gas would be foregone.	There would be no impact on exploration for mineral resources in the Goshute Peak WSA.	There would be no impact to exploration and development of mineral resources.	Exploration for oil and gas and precious metals would be precluded on the 65,585 acres recommended for wilderness designation. This includes 7 miles of seismic lines and 10 miles of new roads along the southeastern border of the suitable area. The 4,185 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads, and exploration for oil and gas is expected to result in 3 miles of seismic lines in the southeastern portion of the WSA.
Impact on Woodland Product Harvest	Wilderness designation would preclude the harvest of woodland products in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% (520 trees) and firewood by 10% (670 cords).	The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 770 cords of firewood per year would be foregone, reducing the resource area's total annual harvest for Christmas trees by 17% and firewood by 11%.	There would be no impact on woodland product harvest in the Goshute Peak the WSA.	Harvest of up to 535 Christmas trees and 670 cords of firewood would be foregone in suitable area, reducing the resource area's total annual harvest of Christmas tree by 15% and firewood by 10%. Harvest in the nonsuitable area would not be impacted and is expected to reach 65 Christmas trees and 100 cords of firewood annually.	Woodland products available for harvest occur in the suitable portion of the WSA. Under this alternative all 600 Christmas trees and 770 cords of firewood would be precluded from harvest,reducing the resource area's total annual harvest of Christmas trees by 17% and firewood by 11%.

SOUTH PEQUOP WSA (NV-010-035)

Proposed Action (Partial Wilderness)

A portion of the South Pequop WSA, 34,544 acres, would be recommended as suitable for wilderness designation. The remaining 6,546 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire South Pequop WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,501 animal unit months (AUMs) for cattle and sheep for the forseeable future. One well would be maintained in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 34,544 acre parcel recommended as suitable for wilderness designation, including 11 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 130 visitor days of ORV use that is projected to occur annually in the area. Approximately 9 miles of cherrystem roads would remain open.

The 6,546 acre parcel recommended nonsuitable would remain open to recreational ORV use including 9 miles of ways. Projections indicate that recreational ORV use would increase to 110 visitor days annually for the forseeable future.

Other Recreation

The 34,544 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 34,544 acres of the South Pequop WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed. Currently, there are no mining claims in the WSA.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the suitable portion of the WSA and none would be foregone.

In the 6,546 acre parcel recommended nonsuitable it is anticipated exploration for precious metals would occur in the northern tip of the WSA resulting in 10 mile of new roads and 20 drill pads disturbing approximately 2 acres. Development is not expected.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although some of the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

Woodland Product Harvest

The South Pequop WSA contains approximately 400 Christmas trees and 385 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future.

Under the Proposed Action, 34,544 acres of the WSA would not be available for harvesting woodland products, precluding the harvest of 445 Christmas trees and 350 cords of firewood annually.

The 6,546 acre parcel recommended nonsuitable does not contain woodland products for public harvest.

All Wilderness

The entire South Pequop WSA, 41,090 acres, would be recommended as suitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire South Pequop WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,501 animal unit months (AUMs) for cattle and sheep for the forseeable future. One well would be maintained in the WSA. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 20 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 240 visitor days of ORV use that is estimated to occur annually in the area.

Other Recreation

The entire WSA would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, all 41,090 acres of the South Pequop WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the WSA. Exploration for precious metals would be foregone including 10 miles of access roads.

Woodland Product Harvest

The South Pequop WSA contains approximately 400 Christmas trees and 385 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future. All harvest would be precluded in this alternative.

No Wilderness

The entire South Pequop WSA, 41,090 acres, would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire South Pequop WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,501 animal unit months (AUMs) for cattle and sheep for the forseeable future. One well would continue to be maintained in the WSA. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 20 miles of vehicle ways, would be open to recreational ORV use. Projections indicate that recreational ORV use would increase to 240 visitor days annually for the forseeable future.

Other Recreation

The WSA would be available for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for all activities is expected to increase to 300 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the entire South Pequop WSA would be open to all forms of appropriation under the mining and mineral leasing laws. Validity examinations would not be conducted.

Under this alternative, exploration for precious metals is expected to occur in the northern tip of the WSA resulting in 10 miles of new road construction and 20 drill pads, disturbing 2 acres. Development is not expected.

No exploration or development is anticipated in the area identified as good potential for phosphates. Although the deposits are high grade, they are discontinuous and thinly bedded making development uneconomical.

Woodland Product Harvest

The South Pequop WSA contains approximately 400 Christmas trees and 385 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future. All of these products would be available for harvest.

Alternative A (Partial Wilderness)

A portion of the South Pequop WSA, 37,573 acres, would be recommended as suitable for wilderness designation. The remaining 3,517 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire South Pequop WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 4,501 animal unit months (AUMs) for cattle and sheep for the forseeable future. One well would be maintained in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 37,573 acre parcel recommended as suitable for wilderness designation, including 5.5 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 175 visitor days of ORV use that is estimated to occur annually in the area. The 9 miles of cherrystem roads would remain open for vehicle access.

The 3,517 acre parcel recommended nonsuitable would remain open to recreational ORV use including 14.5 miles of ways. Projections indicate that recreational ORV use would increase to 65 visitor days annually for the forseeable future.

Other Recreation

The 37,573 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, and fossil collecting. Recreational use for these activities is expected to increase to 1,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 37,573 acres of the South Pequop WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the suitable portion of the WSA. Wilderness designation would preclude two miles of road construction associated with exploration for precious metals.

In the 3,517 acre recommended nonsuitable, exploration for precious metals would result in 8 miles of access roads along the southwestern border of the WSA.

Woodland Product Harvest

The South Pequop WSA contains approximately 400 Christmas trees and 385 cords of firewood that could be harvested annually and still maintain the resource. Demand for these products is expected to exceed the annual sustained yield in the foreseeable future. None of these resources would be available for harvest as all are in the suitable area.

TABLE 2-3

SUMMARY OF IMPACTS
SOUTH PEQUOP WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A
Impact on Wilderness Values	On the 34,544 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, motorized use would adversely impact solitude. On the 6,546 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use and mineral exploration activities.	Naturalness and opportunities for solitude and primitive and unconfined recreation would be maintained in the South Pequop WSA, except along cherrystem roads and boundary roads where uncontrolled motorized access would adversely impact solitude. In the immediate vicinity of closed ways solitude and naturalness would be enhanced.	The South Pequop WSA's wilderness values of naturalness and outstanding opportunities for solitude and primitive and unconfined recreation would be lost due to minerals exploration, ORV use and woodcutting.	The 37,573 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads motorized vehicle use would adversely impact solitude. On the 3,517 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, and mineral exploration activities.
Impact on Recreational ORV Use	Recreational ORV use would be eliminated on the 34,544 acres designated wilderness and 130 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible. On the 6,546 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 110 visitor days annually for the foreseeable future.	Recreational ORV use of 240 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible.	There would be no impact on recreational ORV use.	Recreational ORV use would be eliminated on the 37,573 acres designated wilderness and 175 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible. On the 3,517 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 65 visitor days annually for the foreseeable future.

TABLE 2-3 (Cont.)

SUMMARY OF IMPACTS
SOUTH PEQUOP WSA

Issue	Proposed Action	All Wilderness	No Wilderness	Alternative A
Impact on Development of Mineral Resources	There would be no impacts to exploration or development of mineral resources in the suitable area. The 6,546 acres recommended as non-suitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 10 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is not expected to occur.	There would be impacts to exploration for precious metals in the South Pequop WSa. Exploration would be foregone, precluding 10 miles of new roads.	There would be no impact on mineral resources activities in the South Pequop WSA.	Exploration for precious metals would be precluded on the 37,573 acres recommended for wilderness designation. Two miles of roads and 4 drill pads in northern portion of the suitable area would be precluded. The 3,517 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in eight miles of exploratory access roads and 16 drill pads. Exploration for oil and gas is not expected to occur.
Impact on Woodland Product Harvest	Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. In the nonsuitable area there are no woodland products available for harvest.	The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 400 Christmas trees and 385 cords of firewood per year would be foregone, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%.	There would be no impact on woodland product harvest in the South Pequop WSA.	Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. Harvest in the nonsuitable area would not occur as there are no harvestable product in this area.

BAD LANDS WSA (NV-010-184)

Proposed Action (Partial Wilderness)

A portion of the Bad Lands WSA, 8,415 acres, would be recommended as suitable for wilderness designation. The remaining 1,011 acres would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bad Lands WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 904 animal unit months (AUMs) for cattle, horses and sheep for the forseeable future. One small earthern reservoir would be maintained in the portion recommended suitable for wilderness designation. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The 8,415 acre parcel recommended as suitable for wilderness designation, including 2.5 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 100 visitor days of ORV use that is projected to occur annually in the area.

The 1,011 acre parcel recommended nonsuitable would remain open to recreational ORV use including a [mile way. Projections indicate that recreational ORV use would increase to 50 visitor days annually for the forseeable future.

Other Recreation

The 8,415 acre parcel recommended as suitable for wilderness designation would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, canoeing/rafting and fishing. Recreational use for these activities is expected to increase to 1,000 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the 8,415 acres of the Bad Lands WSA recommended suitable would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which plans of operation have been filed. Currently, there are no mining claims in the WSA.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the suitable or nonsuitable portion of the WSA due to the low potential for occurrence.

All Wilderness

The entire Bad Lands WSA, 9,426 acres, would be recommended as suitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bad Lands WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 904 animal unit months (AUMs) for cattle, horses and sheep for the forseeable future. Two small earthern reservoirs and 1.5 miles of fence would be maintained in the WSA. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 3 miles of vehicle ways, would be closed to recreational ORV use. This would eliminate approximately 150 visitor days of ORV use that is estimated to occur annually in the area.

Other Recreation

The entire WSA would be managed for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, canoeing/rafting, and fishing. Recreational use for these activities is expected to increase to 1,500 visitor days annually for the forseeable future.

Mineral Resources Actions

Subject to valid existing rights, the entire Bad Lands WSA would be withdrawn from all forms of appropriation under the mining and mineral leasing laws. Validity examinations would be conducted on any mining claims that exist at the time of designation and upon which have plans of operation have been filed. Currently, there are no mining claims in the WSA.

Under this alternative, no exploration or development of any mineral resource is expected to occur in the WSA.

No Wilderness

The entire Bad Lands WSA, 9,426 acres, would be recommended as nonsuitable for wilderness designation.

Livestock Grazing and Range Management Actions

The entire Bad Lands WSA would continue to be allotted for livestock grazing. Projections indicate that livestock use would be maintained at the existing level of 904 animal unit months (AUMs) for cattle and sheep for the forseeable future. Project maintenance would continue as in the past. No additional projects are planned in the WSA.

Recreational Off-Road Vehicle Use

The entire WSA, including 3 miles of vehicle ways, would be open to recreational ORV use. Recreational ORV use is anticipated to reach 150 visitor days annually in the foreseeable future.

Other Recreation

The WSA would be available for non-motorized recreation activities. These include hiking, backpacking, hunting, horseback riding, camping, wildlife observation, sightseeing/photography, rock climbing, canoeing/rafting and fishing. Recreational use for all activities is expected to increase to 750 visitor days annually for the forseeable future.

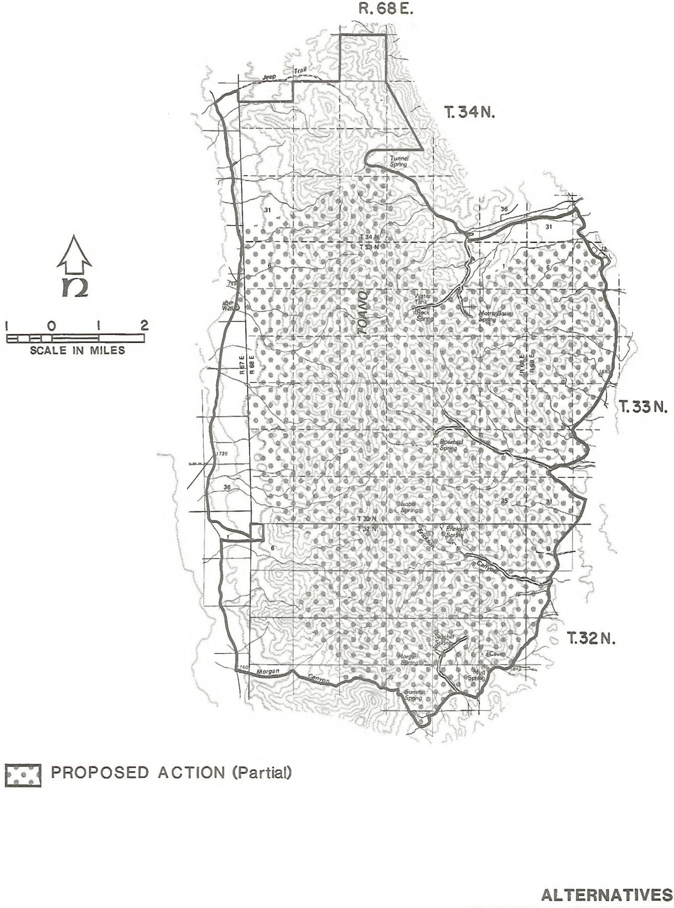
Mineral Resources Actions

Subject to valid existing rights, all 9,426 acres of the Bad Lands WSA would be open to all forms of appropriation under the mining and mineral leasing laws. Validity examinations would not be conducted. Currently, there are no mining claims in the WSA. No exploration or development of any mineral resource is expected to occur in the WSA.

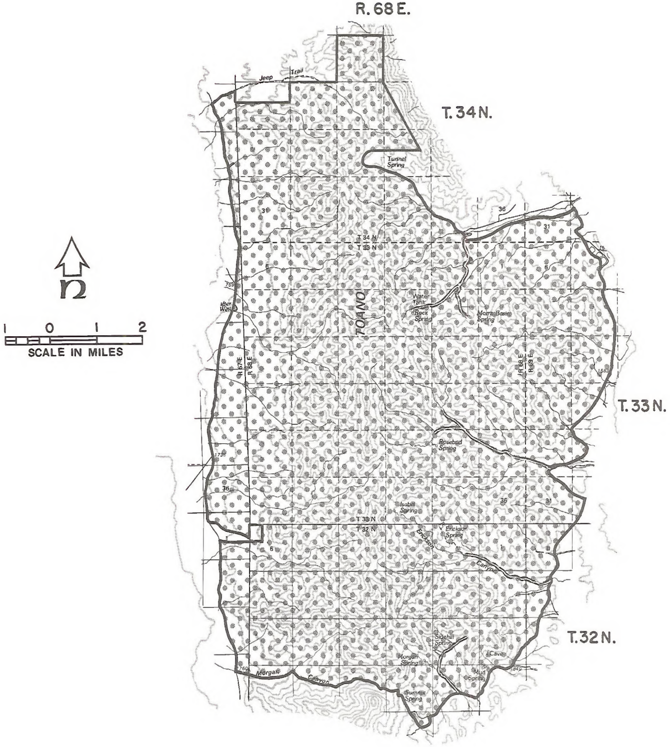
TABLE 2-4

SUMMARY OF IMPACTS
BAD LANDS WSA

Issue	Proposed Action	All Wilderness	No Wilderness
Impact on Wilderness Values	On the 8,415 acres designated as wilderness would maintain long-term naturalness and opportunities for primitive and unconfined recreation and solitude. On the 1,011 acres not designated as wilderness, there would be a reduction of naturalness and opportunities for solitude and primitive recreation.	Wilderness values of naturalness and opportunities for primitive and unconfined recreation and solitude would be retained except along boundary roads where uncontrolled motorized access would adversely impact solitude. In the immediate vicinity of the closed ways naturalness and solitude would be enhanced.	There would be a reduction in naturalness and opportunities for solitude and primitive and unconfined recreation due to continued ORV use.
Impact on Recreational ORV Use	Recreational ORV use of 100 visitor days would be forgone annually. On the 1,011 acres of the WSA not designated as wilderness, recreational ORV use would continue to increase, but would not exceed 50 visitor days annually.	Recreational ORV use of 150 visitor days would be forgone annually.	There would be no impact on recreational ORV use.
Impact on Development of Mineral Resources	There would be no impacts to mineral activities as none are projected to occur.	There would be no impacts to mineral activities as none are projected to occur.	The entire WSA would be open for mineral entry and leasing. No mineral activities are expected to occur.

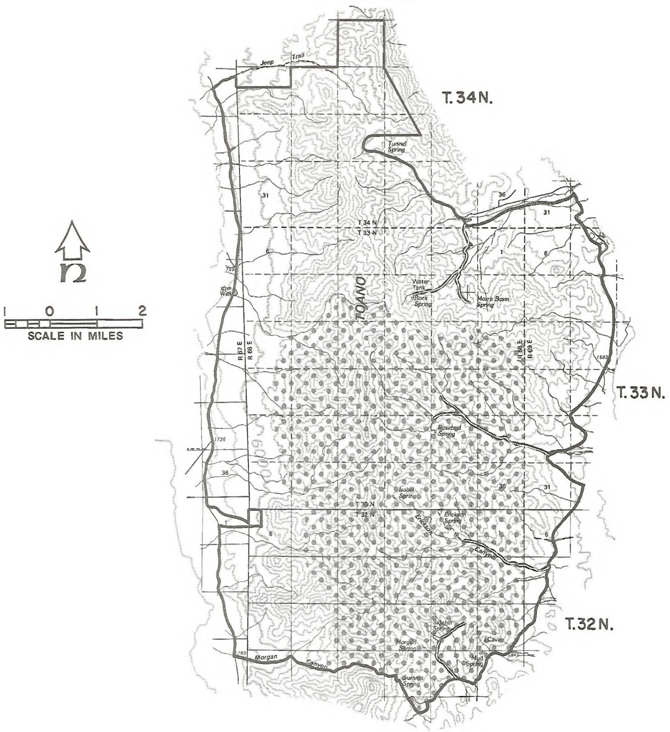


ALTERNATIVES
BLUEBELL NV-010-027



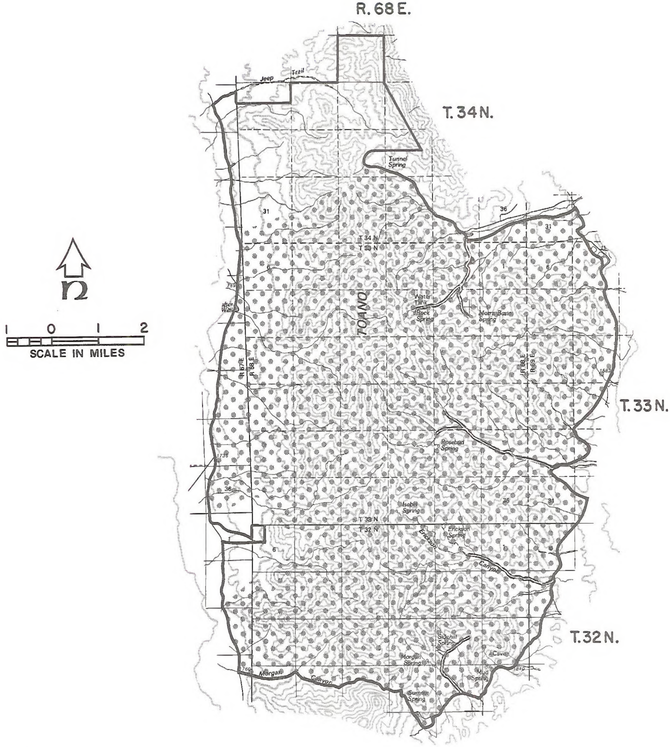
▨ ALL WILDERNESS

ALTERNATIVES
BLUEBELL NV-010-027



▨ ALTERNATIVE A (Partial)

ALTERNATIVES
BLUEBELL NV-010-027



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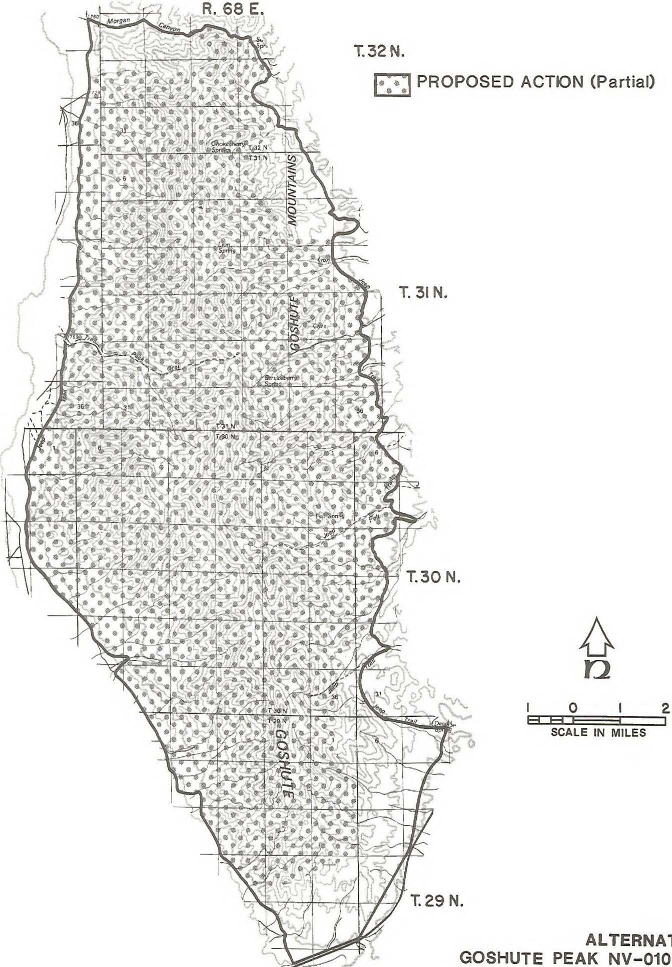
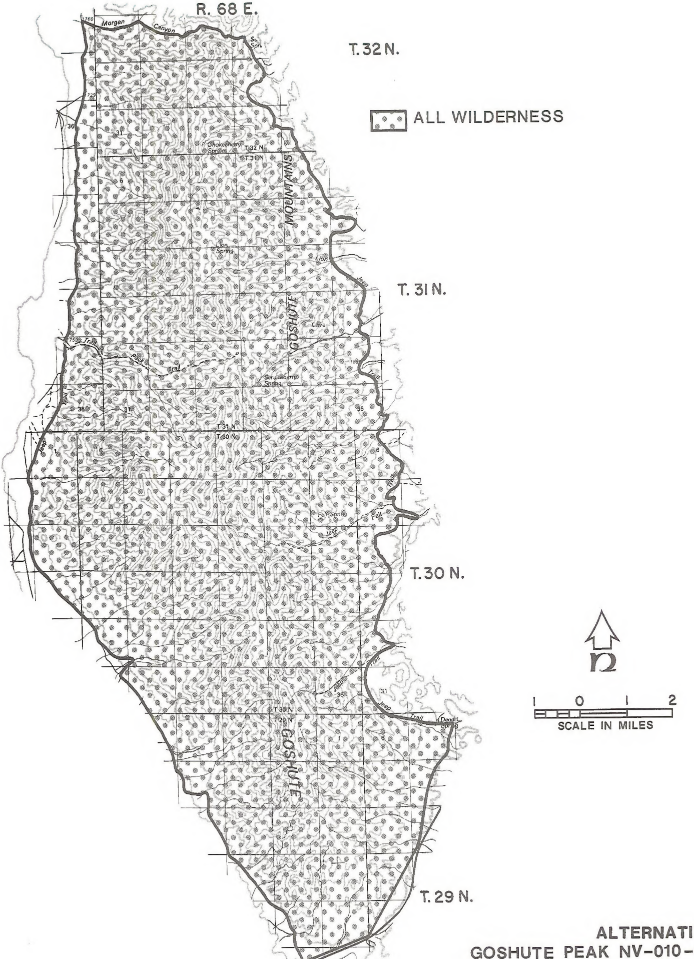
ALTERNATIVES
BLUEBELL NV-010-027



ALTERNATIVES
GOSHUTE PEAK NV-010-033



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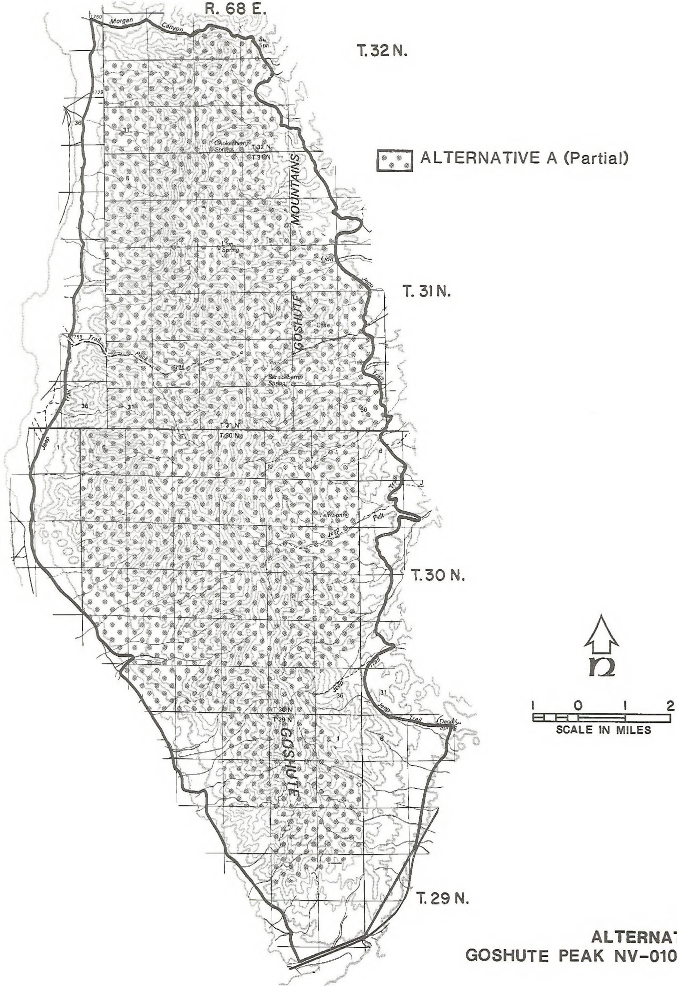

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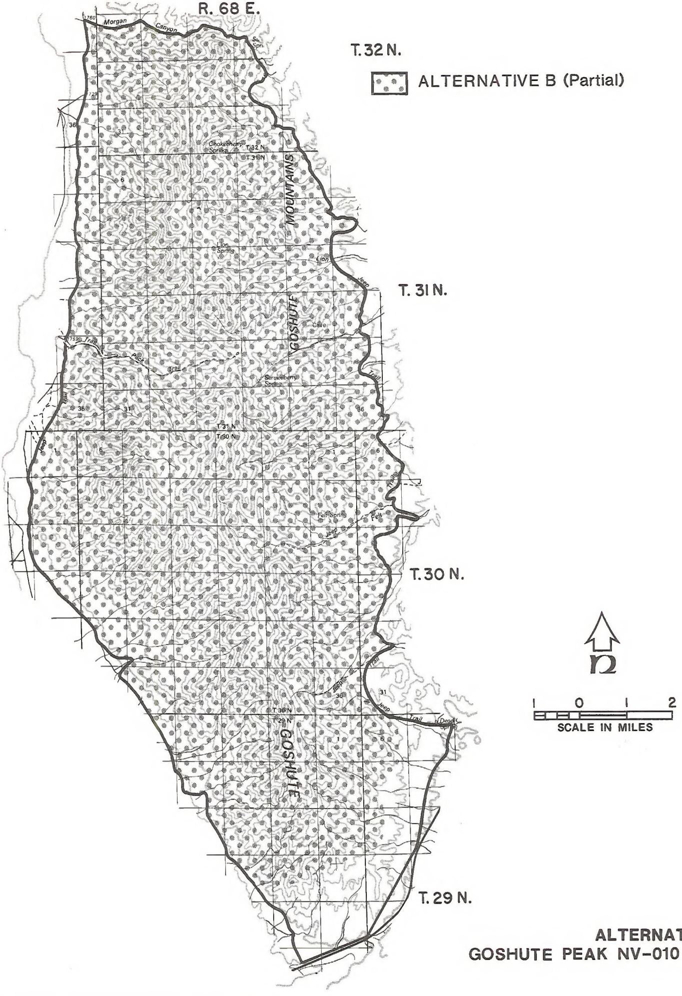

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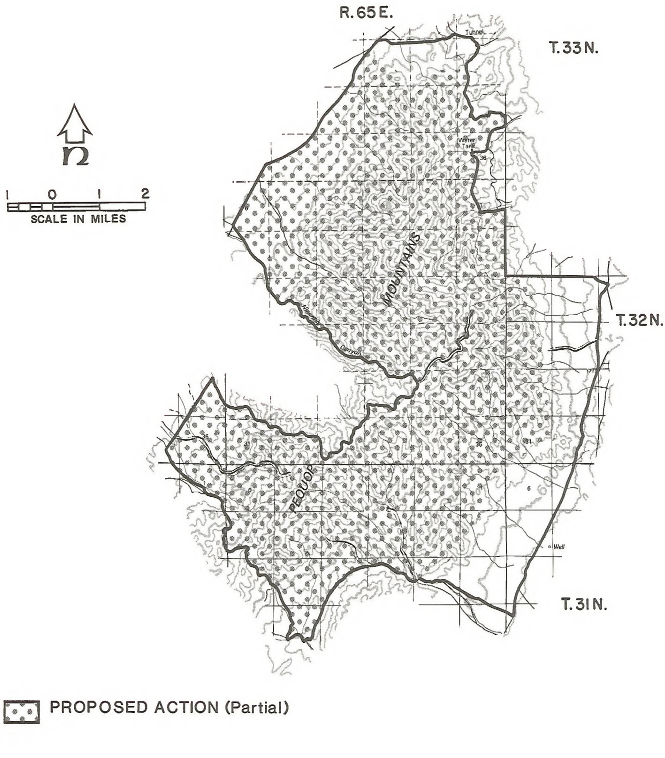
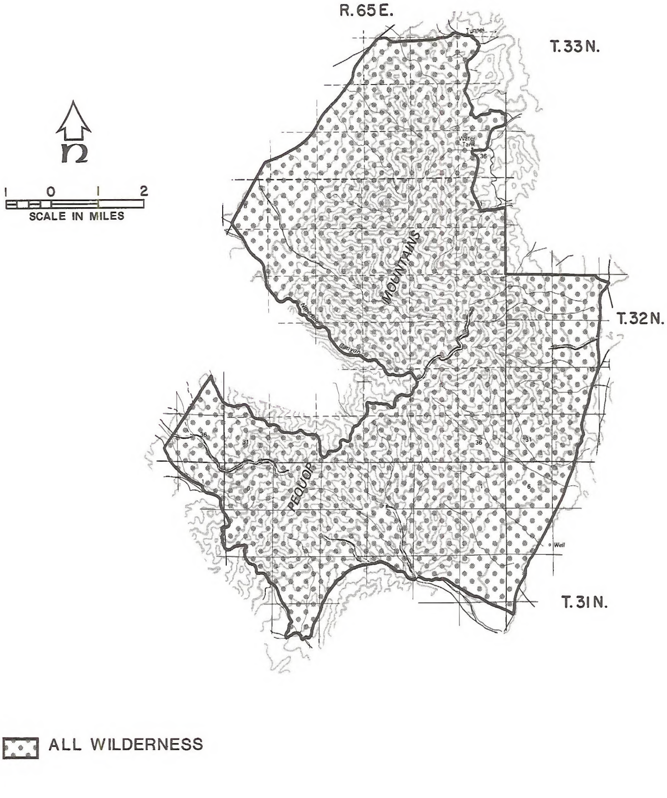
GOSHUTE PEAK NV-010-033

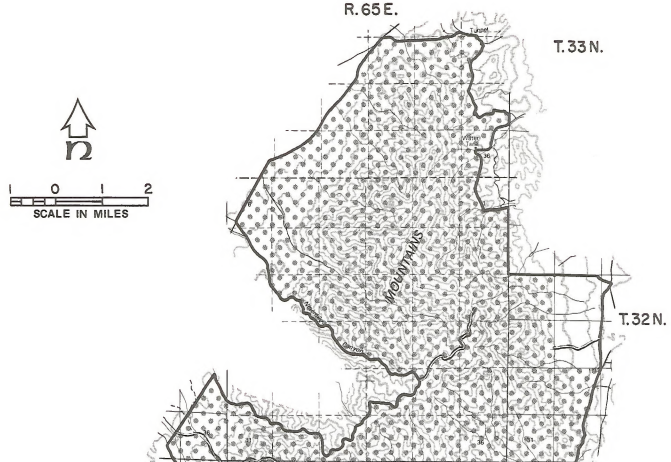


ALTERNATIVES
SOUTH PEQUOP NV-010-035

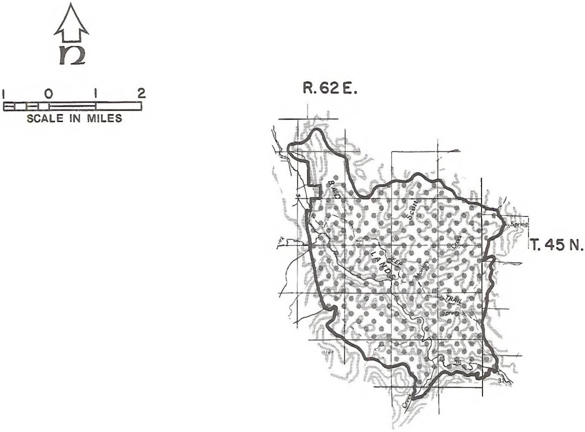


▨ ALL WILDERNESS

ALTERNATIVES
SOUTH PEQUOP NV-010-035

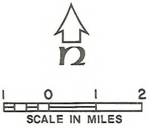


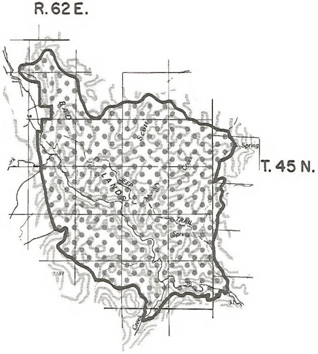
ALTERNATIVES
SOUTH PEQUOP NV-010-035



▨ PROPOSED ACTION (Partial)

ALTERNATIVES
BAD LANDS NV-010-184





▨ ALL WILDERNESS

ALTERNATIVES
BAD LANDS NV-010-184

CHAPTER 3

AFFECTED ENVIRONMENT

BLUEBELL WSA (NV-010-027)

General Characteristics

The Bluebell WSA is located approximately 95 miles east of Elko, Nevada and 10 miles southwest of West Wendover, Nevada in the northern extension of the Goshute Mountain Range. The WSA is forested with juniper, mountain mahogany, white fir, and pinyon and limber pine with smaller scatterings of bristlecone pine. In the west half, the topography consists of a single north-south ridgeline with very little bench land. In the east half, the topography consists of lower mountains and basins supporting hundreds of small meandering canyons. Elevations range from 8,000 feet on the ridgeline to 5,300 feet in the foothills.

Land Status

The Bluebell WSA contains 55,665 acres of public land. There are no private or state lands within the WSA.

Wilderness Values

Naturalness

Within the boundaries of the Bluebell WSA are approximately twenty miles of vehicle ways, eight miles of cherrystem roads, ten small earthen reservoirs, four corrals, a mile long fence, and two developed springs. The vehicle ways are found primarily in the canyons adjacent to existing roads. The reservoirs are found along vehicle ways on the west side of the study area. The four corrals, the fence and the two developed springs are located adjacent to existing roads. Total acreage involved is approximately thirty acres. While these imprints are within the WSA, the area generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable.

Solitude

The WSA is extremely rugged with high mountain peaks and numerous drainages. This highly dissected topography provides numerous outstanding opportunities for solitude. The majority of the WSA is densely wooded, which creates a feeling of total seclusion. This is particularly true in the major drainages such as West Morris, Morris, Morgan Basin, Thirty-mile, Johnson, Rosebud, and Erickson Canyons.

Primitive and Unconfined Recreation

The Bluebell WSA, with its relatively large size and varied topography, contains outstanding opportunities for a primitive and unconfined type of recreation experience. The majority of the WSA allows for unconfined freedom of movement due to the many drainages, ridges and peaks.

Primitive recreation activities available include hiking, backpacking, camping, hunting, horseback riding, wildlife observation, sightseeing/photography, rock climbing and fossil collecting.

Special Features

The Bluebell WSA contains rugged mountain scenery, colorful rock outcroppings and broad vistas of the Basin and Range Province.

Bristlecone pine trees occur at the higher elevations. These trees are of special interest because they are the oldest living things known and are found in only a few high elevation areas in the United States.

The Goshute Mountains (Bluebell and Goshute Peak WSAs) are the location of an annual southern migration from late August to mid-October of thousands of raptors. Birds known to migrate through the area include golden and bald eagles, redtailed hawks, goshawks, American kestrels and Cooper's hawks.

Abundant collectable invertebrate fossils are found weathering out of the limestones and shales and are more commonly found in freshly eroded areas. Fossils are generally invertebrates with a large variety of brachiopods, corals, bryozoans, and trilobites to be found.

Wild and free roaming horses are present within the WSA. The WSA is situated within the Goshute Mountains Wild Horse Herd Management Area.

Recreation

There are no developed recreation sites within the WSA and none are planned. Recreation use is light throughout the WSA with most use related to hunting for mule deer. Other recreation activities include rock climbing and fossil collecting.

Current visitor use is estimated at 300 visitor days annually. Of these, 240 are estimated to be hunting activities supported by vehicle access on cherrystem roads and ways. Recreational ORV use is anticipated to reach 480 visitor days annually in the foreseeable future.

Mineral Resources

Rocks cropping out within the WSA are chiefly Paleozoic limestones which are complexly faulted. Igneous activity has occurred in the east-central part of the range and probably served as a source for the mineralization apparent in the area. Rocks correlative to those cropping out in the WSA are known to be favorable hosts in nearby mineralized areas (Ferguson Springs, Ferber, Decoy Mining District).

Five post-FLPMA oil and gas leases covering approximately 8,310 acres are located along the east and west borders of the WSA. The potential for an oil and gas discovery in the WSA exists, but the probability is low as the more favorable intermontane areas are outside of the WSA.

About 105 post-FLPMA mining claims are located within the WSA; there are no pre-FLPMA mining claims in the WSA.

Available data indicates the WSA has relatively small areas of high and good locatable mineral potential with most of the area having a low potential of metallic and nonmetallic minerals, phosphates, oil and gas and geothermal resources.

Small high grade barite deposits occur along the range front fault on the west side of the Goshute Mountains. An old manganese mine in the Decoy Mining District is also present along the west fault line indicating a possibility of mineralization at depth. Mineral Resource Inventory (MRI) rock analyses show anomalous concentrations of barite, manganese, vanadium, and zinc in the Decoy Mining District.

Limestone is the dominant lithology in the WSA. Most of the limestone is apparently of a quality suitable for producing lime. Marbelhead Lime Co. has undeveloped claims for limestone along the northern border of the study area. The limestone is potentially valuable on the claims due to its close proximity to rail lines and Interstate 80.

Phosphates correlative to the Permian Phosphoria Formation, which is a considerable producer of phosphates in southern Idaho, occur in the north-central part of the WSA. The limited areal extent of this occurrence and the thin nature of similar phosphate rocks in northeastern Nevada make it doubtful that the resource would be developed in the forseeable future.

There are no recorded geothermal resource areas in the vicinity of the Bluebell WSA. There is no active mining in the WSA. Minor exploration has taken place, but no mineral development has occurred within the WSA. There are no known critical or strategic minerals in the WSA, but the potential for discoveries of manganese (critical) and copper, barite, lead, and tungsten (strategic) is considered good on 4,000 acres and high on 900 acres. The great majority of the WSA has low mineral potential for all commodities.

Livestock Grazing

The entire WSA is currently allotted for livestock grazing. The WSA includes portions of five grazing allotments: Spruce, Big Springs, Pilot, Leppy Hills and Utah/Nevada. Seven cattle and sheep operators are permitted in these allotments. Approximately 4,340 AUMs are licensed in the portions of the allotments that lie within the WSA boundaries. Grazing occurs as yearlong, winter and spring use by cattle and winter use by sheep.

A one-mile fence, 10 small earthen reservoirs and two developed springs occur within the WSA. Maintenance has historically been accomplished by use of motorized vehicles. No additional projects are planned for future development.

Woodland Products

The WSA contains 27,830 acres of pinyon, juniper and mountain mahogany trees usable for Christmas trees, fuelwood, fence posts and pine nut collection. Wendover and Salt Lake Valley residents have historically used the Goshute Mountains to collect these products.

It is estimated that the Bluebell WSA could furnish approximately 600 Christmas trees and 475 cords of firewood annually on a sustained yield basis.

Wildlife Habitat

The WSA includes 1,450 acres of mule deer winter and 22,000 acres of mule deer yearlong habitat, 5,700 acres of antelope yearlong habitat and 12,650 acres of historical bighorn sheep habitat.

No future habitat manipulations or projects are proposed. The Nevada Department of Wildlife is considering reintroducing bighorn sheep into the Goshute Mountain Range. On a statewide basis the Goshute Range is considered low priority.

The WSA includes a portion of a migration route for raptors. Thousands of raptors annually migrate south over the Goshute Mountain Range from late August through October.

Watershed

A few springs are scattered about the WSA and provide limited surface water. Approximately 440 acres of high erosion potential watershed are located in the northeast portion of the WSA and approximately 5,160 acres in the southeast portion.

GOSHUTE PEAK WSA (NV-010-033)

General Characteristics

The Goshute Peak WSA is located approximately 100 miles east of Elko, Nevada and 20 miles southwest of West Wendover, Nevada in the southern extension of the Goshute Mountain Range. The WSA is forested with juniper, mountain mahogany, white fir, and pinyon and limber pine with smaller scatterings of bristlecone pine. The WSA is mountainous with steep cliffs and rocky canyons to the west and densely forested mountains and basins to the east. Cliffs on the west side range from 50 to 250 feet in elevation, are extremely rugged and are of high scenic quality. A small amount of benchland exists along the southeastern portion of the WSA. Elevations range from 9,500 feet on the ridgeline to 6,000 feet in the foothills.

Land Status

The Goshute Peak WSA contains 69,770 acres of public land. There are no private or state lands within the WSA. A portion of the southeastern boundary of the WSA is formed by a phoneline adjacent to Alternate Highway 93. Portions of the rights-of-way for the phoneline and highway are within the WSA.

Wilderness Values

Naturalness

Within the boundaries of the Goshute Peak WSA are approximately 27 miles of vehicle ways, a one mile cherrystem road, one corral, a mile long fence, and one developed spring. Most of the vehicle ways are less than one mile long and provide access to drainages and canyons from the WSA boundary roads. The corral, the fence and the developed spring are located adjacent to existing ways. Other imprints of man include a deer hunter's cabin, a deer hunter's camp and a raptor counting and trapping area. The raptor trapping area includes two blinds made of plywood. While these imprints are within the WSA, the area generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable.

Solitude

The WSA is extremely rugged, with high mountain peaks and numerous drainages. This highly dissected topography provides numerous outstanding opportunities for solitude. The majority of the WSA is densely wooded, which creates a feeling of total seclusion. This is particularly true in the major drainages such as Lion, Felt, Christmas Tree, and other unnamed drainages.

Primitive and Unconfined Recreation

The Goshute Peak WSA, with its large size and varied topography, contains outstanding opportunities for a primitive and unconfirmed type of recreation experience. The majority of the WSA allows for unconfined freedom of movement due to the many drainages, ridges and peaks.

Primitive recreation activities available include hiking, backpacking, camping, hunting, horseback riding, wildlife observation, sightseeing/photography, rock climbing and fossil collecting.

Special Features

The Goshute Peak WSA contains rugged mountain scenery, colorful rock outcroppings and broad vistas of the Basin and Range Province.

Bristlecone pine trees occur at the higher elevations. These trees are of special interest because they are the oldest living things known and are found in only a few high elevation areas in the United States.

The Goshute Mountains (Bluebell and Goshute Peak WSAs) are the location of an annual southern migration from late August to mid-October of thousands of raptors. Birds known to migrate through the area include golden and bald eagles, redtailed hawks, goshawks, American kestrels and Cooper's hawks. The U.S. Fish and Wildlife Service has trapped and observed raptors in the Goshute Mountains for the past several years. The area is probably one of the most productive ridge sites for raptor migrations in the West.

Adding to the raptor migration is the bald eagle roosting site located in the southwestern portion of the WSA. The site is used annually by several bald eagles during their migration south. It is the only known wintering roost site in Elko County.

Abundant collectable invertebrate fossils are found weathering out of the limestones and shales and are more commonly found in freshly eroded areas. Fossils are generally invertebrates, with a large variety of brachiopods, corals, bryozoans and trilobites to be found.

Wild and free roaming horses are present within the WSA. The WSA is situated within the Goshute Mountains Wild Horse Herd Management Area.

Recreation

There are no developed recreation sites within the WSA and none are planned. Recreation use is light throughout the WSA with most use related to hunting for mule deer. Other recreation activities include rock climbing, fossil collecting and raptor viewing.

Current visitor use is estimated at 800 visitor days annually. Of these, 640 are estimated to be hunting activities supported by vehicle access on cherrystem roads and ways. Recreational ORV use is anticipated to reach 1200 visitor days annually in the foreseeable future.

Mineral Resources

Cropping out within the WSA are chiefly Paleozoic limestones which have been thrusted and normally faulted. These rocks have been locally intruded by Jarassic quartz monzonite bodies and overlain by mid-Tertiary volcanics.

Five post-FLPMA oil and gas leases covering approximately 7,130 acres are located along the western, southern and southeastern borders of the WSA. The potential for an oil and gas discovery in the WSA exists, but the probability is low as the more favorable intermontane areas are outside of the WSA.

About 190 post-FLPMA mining claims are located in the WSA; there are no pre-FLPMA mining claims in the WSA.

Available data indicates the WSA has relatively small areas of high and good locatable mineral potential, with most of the area having a low potential of metallic and nonmetallic minerals, phosphates, oil and gas and geothermal resources.

Small high grade barite deposits have been reported along the range front fault on the west side of the Goshute Mountains. A small amount of silver and copper was produced from the Ferguson Spring Mining District adjacent to the eastern border of the WSA. Mineral Resource Inventory (MRI) rock analyses show anomalous concentrations of barite, gold, silver, copper, lead, manganese, and zinc in the Ferguson Spring Mining District.

Limestone is the dominant lithology in the WSA. Most of the limestone is apparently of a quality suitable for producing lime. The widespread occurrence of similar deposits much nearer rail lines and highways makes development in the WSA unlikely.

There are no recorded geothermal resource areas in the vicinity of the Goshute Peak WSA. There is no active mining in the WSA. Minor exploration has taken place, but no mineral development has occurred within the WSA and no significant ore deposits are known to exist. There are no known critical or strategic minerals deposits in the WSA, but the potential for discoveries of copper, barite, lead, and tungsten (strategic) is considered good on 5,395 acres. The great majority of the WSA has low mineral potential for all commodities.

Livestock Grazing

The entire WSA is currently allotted for livestock grazing. The WSA includes portions of four grazing allotments: Spruce, White Horse Pass, Lead Hills and Utah/Nevada. Six cattle and sheep operators are permitted in these allotments. Approximately 5,593 AUMs are licensed in the portions of the allotments that lie within the WSA boundaries. Grazing occurs as winter and spring use by cattle and sheep.

A one-mile fence, one corral and one developed spring occur within the WSA. Historically, project maintenance and some livestock management have been performed using motorized equipment. No additional projects are planned.

Woodland Products

The WSA contains 45,350 acres of pinyon, juniper and mountain mahogany trees usable for Christmas trees, fuelwood, fence posts and pine nut collection. Wendover and Salt Lake Valley residents have historically used the Goshute Mountains to collect these products.

It is estimated that the Goshute Peak WSA could furnish approximately 600 Christmas trees and 770 cords of firewood annually on a sustained yield basis.

Wildlife Habitat

The WSA includes 4,675 acres of mule deer winter and 31,500 acres of mule deer yearlong habitat, 7,000 acres of antelope yearlong habitat and 62,000 acres of historical bighorn sheep habitat.

No future habitat manipulations or projects are proposed. The Nevada Department of Wildlife is considering reintroducing bighorn sheep into the Goshute Mountain Range. On a statewide basis the Goshute Range is considered low priority.

The WSA is the site of an annual migration of 6,000 to 10,000 raptors. These raptors migrate south over Goshute Peak from late August to October. Raptors include bald and golden eagles, red-tailed hawks, goshawks, American kestrals and Cooper's hawks. The U.S. Fish and Wildlife Service has been trapping and observing raptors for several years. Their activity includes transporting equipment and supplies by vehicle along a way, then by foot to the ridgeline.

A winter bald eagle roost is located in the southwestern portion of the WSA. This roost site is used annually by several bald eagles as they migrate south for the winter. The roost is the only one known in the area.

Watershed

A few springs are scattered about the WSA and provide limited surface water. Approximately 572 acres of high erosion potential watershed are located in the south-central portion of the WSA.

SOUTH PEQUOP WSA (NV-010-035)

General Characteristics

The South Pequop WSA is located approximately 4 miles southeast of Elko, Nevada the Pequop Mountain Range. The WSA is forested with juniper, white fir and pinyon and limber pine with smaller scatterings of bristlecone pine. The WSA is U-shaped and comprised of a main northeast to southwest trending ridgeline. A small amount of rolling hills and benchland occurs along the borders of the WSA. Elevations range from 8,950 feet on the ridgeline to 5,650 feet in the foothills.

Land Status

The South Pequop WSA contains 41,090 acres of public land. There are no private or state lands within the WSA. The mid-eastern border of the WSA adjoins private land in sections 1 and 12 of T. 32 N., R. 65 E. and sections 17 and 18 of T. 32 N., R. 66 E.

Wilderness Values

Naturalness

Within the boundaries of the South Pequop WSA are approximately twenty miles of vehicle ways, ten miles of cherrystem roads, and one well. A Western Pacific railroad line occurs along the northern boundary.

While these imprints are within the WSA, the area generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable.

Solitude

Portions of the WSA are rugged, with high mountain peaks, numerous drainages and dense woodlands. This highly dissected topography provides numerous outstanding opportunities for solitude. Southern exposures with sparse and low growing vegetation combined with the unusual configuration of the WSA could hamper opportunities for solitude in some areas. Trains on the Western Pacific railroad tracks can be viewed and heard from the far northern end of the WSA.

Primitive and Unconfined Recreation

The South Pequop WSA, with its relatively large size and varied topography, contains outstanding opportunities for a primitive and unconfirmed type of recreation experience. The majority of the WSA allows for unconfined freedom of movement due to the many drainages, ridges and peaks.

Primitive recreation activities available include hiking, backpacking, camping, hunting, horseback riding, wildlife observation, sightseeing/photography, rock climbing and fossil collecting.

Special Features

The South Pequop WSA contains rugged mountain scenery, colorful rock outcroppings and broad vistas of the Basin and Range Province.

Bristlecone pine trees occur at the higher elevations. These trees are of special interest because they are the oldest living things known and are found in only a few high elevation areas in the United States.

Collectable invertebrate fossils are found weathering out of the limestones and shales and are more commonly found in freshly eroded areas. Fossils are generally invertebrates,with a large variety of brachiopods, corals, bryozoans, and trilobites to be found.

Wild and free roaming horses are present within the WSA. The WSA is situated within the Spruce-Pequop Wild Horse Herd Management Area.

Recreation

There are no developed recreation sites within the WSA and none are planned. Recreation use is light throughout the WSA with most use related to hunting for mule deer. Other recreation activities include rock climbing and fossil collecting.

Current visitor use is estimated at 150 visitor days annually. Of these, 120 are estimated to be hunting activities supported by vehicle access on cherrystem roads and ways. Recreational ORV use is anticipated to reach 240 visitor days annually in the foreseeable future.

Mineral Resources

Rocks cropping out within the WSA are chiefly Ordovician through Triassic age with limestone, shale, chert, siltstone and sandstone being the dominant lithologies. Lesser amounts of Tertiary volcanoclastic rocks also occur.

Seven oil and gas leases covering approximately 9,860 acres are located along the mid-eastern, southern and western borders of the WSA. The potential for an oil and gas discovery in the WSA exists, but the probability is low as the more favorable intermontane areas are outside of the WSA. Wildcat drilling has occurred in the valleys around the Pequop Range but no discoveries were made.

There are no mining claims in the WSA. A total of 16,363 acres in the south and northeast portions of the WSA are classified as having good potential for phosphates. The northern end of the WSA contains 500 acres with good potential for base metals. The remainder of the WSA contains low potential for all minerals. No geothermal features occur in or near the WSA which is rated as having low potential for geothermal resources. Minor exploration of phosphate rock has taken place, but no mineral development has occurred in the WSA. Much of the WSA (40%) has good potential for phosphate rock, but the phosphate beds are thin or of a low grade and little interest has been expressed to date. A small area along the northern boundary of the WSA has good potential for base metals. The WSA has low potential for all other mineral resources.

Livestock Grazing

The entire WSA is currently allotted for livestock grazing. The WSA is situated within the Spruce grazing allotment. Three cattle and sheep operators are permitted in this allotment. Approximately 4,501 AUMs are licensed within the WSA. Grazing occurs as winter and spring use by cattle and sheep.

There is one well in the WSA. No additional projects are planned. Historically, project maintenance and some livestock operations have been performed using motorized equipment.

Woodland Products

The WSA contains 22,725 acres of pinyon, juniper and mountain mahogany trees usable for Christmas trees, fuelwood, fence posts and pine nut collection. It is estimated that the South Pequop WSA could furnish approximately 400 Christmas trees and 385 cords of firewood annually on a sustained yield basis.

Wildlife Habitat

The WSA includes 7,000 acres of mule deer winter and 8,000 acres of mule deer yearlong habitat. No future habitat manipulations or projects are proposed.

Watershed

A few springs are scattered about the WSA and provide limited surface water. There are no areas of high erosion potential watershed in the WSA.

BAD LANDS WSA (NV-010-184)

General Characteristics

The Bad Lands WSA is located approximately 65 miles northeast of Elko, Nevada and 25 miles southwest of Jackpot, Nevada in the O'Neil Basin. The WSA consists of rough ridges and cliffs of volcanic origin, dissected by Salmon Falls Creek. Pinnacles and spires over 100 feet tall are common along Salmon Falls Creek Canyon. Dense riparian vegetation exists throughout the main canyon and in the lower reaches of the adjoining side canyons.

Land Status

The Bad Lands WSA contains 9,426 acres of public land. There are no private or state lands within the WSA. The WSA adjoins private land in the northwestern and southeastern corners.

Wilderness Values

Naturalness

Within the boundaries of the Bad Lands WSA are approximately three miles of vehicle ways, two small earthen reservoirs, a 103 acre crested wheatgrass seeding, 1.5 miles of bladed fenceline, and 1.5 miles of phoneline. While these imprints are within the WSA, they are separated by long distances, and the area generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable.

Solitude

Salmon Falls Creek Canyon, the dominant attraction in the WSA, provides outstanding opportunities for solitude. Topographic screening is excellent due to the winding nature of the canyon and rugged canyon walls. Riparian vegetation is dense, and in many areas the big sagebrush attains heights of six feet.

The sparsely vegetated mesas and rolling topography above the main canyon generally provide little vegetative screening.

Primitive and Unconfined Recreation

The Bad Lands WSA, even with its relatively small size, contains outstanding opportunities for a primitive and unconfined recreation experience. The majority of the WSA allows for unconfined freedom of movement due to the many drainages, hills and ridges. While users would concentrate along Salmon Falls Creek, the dense riparian vegetation and the winding and rugged nature of the canyon ensures that opportunities for primitive and unconfined recreation are available.

Primitive recreation activities available include hiking, backpacking, camping, hunting, horseback riding, wildlife observation, sightseeing/photography, canoeing/rafting and fishing.

Special Features

The untrampled streamside riparian habitat is considered a unique ecological feature. The fishery through the WSA offers one of the best opportunities for stream fishing in Elko County. The WSA also contains a diversity in flora and fauna.

Rugged canyonland scenery, colorful volcanic rock outcroppings, and scenic vistas of the Jarbidge Mountains are available.

Geologically, rhyolitic lava flows and eroded pinnacles of volcanic ash are interesting features found in the WSA.

Recreation

There are no developed recreation sites within the WSA and none are planned. Recreation use is light throughout the WSA with most use related to hunting and fishing. Other recreation activities include canoeing and rafting.

Current visitor use is estimated at 150 visitor days annually. Of these, only 30 are estimated to be hunting activities supported by vehicle access on ways. The majority of recreation users park their vehicles on private land outside the WSA and walk in. Recreational ORV use is anticipated to reach 150 visitor days annually in the foreseeable future.

Mineral Resources

The Bad Lands WSA is almost entirely underlain by Tertiary felsic volcanic extrusives of which rhyolite to dacite flows and domes are dominant. Lesser amounts of volcanoclastic rocks consisting of tuffaceous sandstone and siltstone also occur. A small amount of Permain through Missippian age limestone may occur along the eastern border of the WSA.

There are no oil and gas leases located in the WSA. The presence of a mesozoic granitic pluton near the WSA and paucity of Tertiary lake bed sediments underlying the WSA are major negative criteria for oil and gas accumulations. No geothermal occurrences or major fault zones have been observed in the WSA, hence, the low potential for geothermal resources.

There are no mining claims in the WSA. The Contact Mining District is located about two miles east of the WSA. The district has produced minor amounts of copper and very small amounts of tungsten, molybdenmum, gold, silver and lead. Mineralization in the district occurs along contacts between Mesozoic granites and Mississippian - Permian limestones and shales. The classification of 500 acres along the eastern boundary as having good potential for metallic minerals is based on the possibility of the mineralized zone of the Contact Mining District extending under the WSA. Limestone, a favorable host rock for mineralization, occurs in the far eastern portion of the WSA. Except for the small area noted above, the WSA has low potential for all locatable minerals, as the area is underlain by thousands of feet of unmineralized volcanic rocks.

Livestock Grazing

The entire WSA is currently allotted for livestock grazing. The WSA includes portions of four grazing allotments: Buckhorn, O'Neil, Hubbard Vineyard and Salmon River. Four cattle, sheep and horse operators are permitted in these allotments. Approximately 904 AUMs are licensed in the portions of the allotments that lie within the WSA boundaries. Grazing occurs during all seasons.

A 1.5-mile fence, two small earthen reservoirs and a 103 acre crested wheatgrass seeding occur within the WSA. No additional projects are planned. Historically, project maintenance has been performed using motorized equipment.

Wildlife Habitat

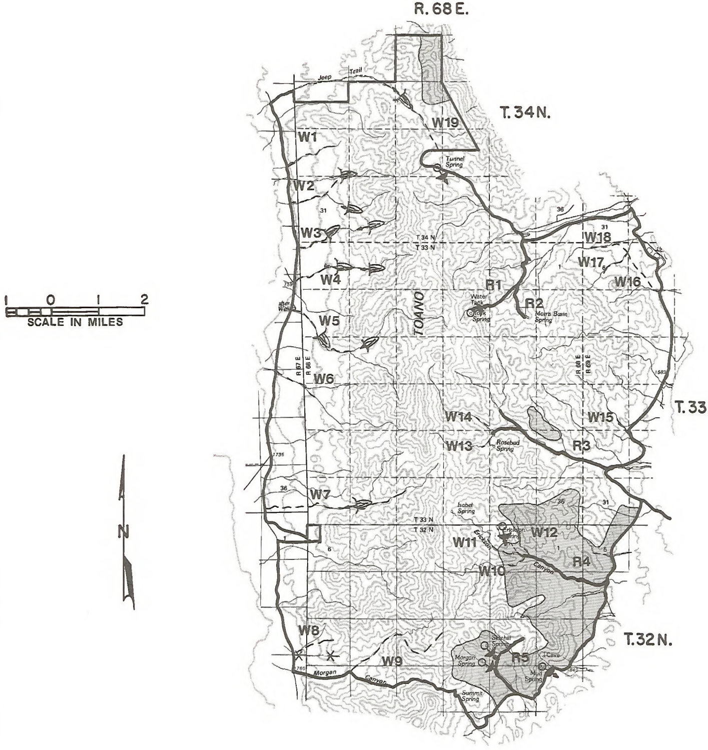
The WSA includes 4,450 acres of mule deer winter, 1,020 acres of mule deer spring and 3,950 acres of mule deer summer habitat, 6,650 acres of antelope summer habitat and 9,426 acres of historical bighorn sheep habitat.

No future habitat manipulations or projects are proposed. The Nevada Department of Wildlife is planning to reintroduce bighorn sheep into the WSA. On a statewide basis the Bad Lands WSA is considered a high priority.

Salmon Falls Creek provide fisheries habitat for German brown and rainbow trout and offers some of the best trout fisheries in Elko County.

Watershed

The entire WSA is classified as moderate erosion potential watershed. Surface water is provided by two springs and the perennial flow of Salmon Falls Creek.

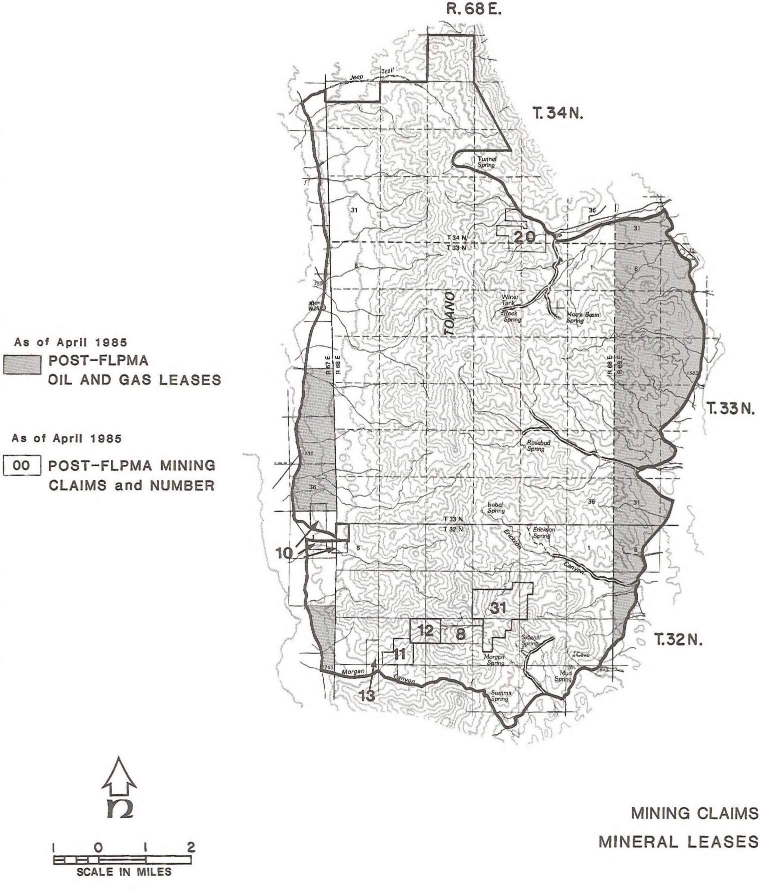


▨ HIGH EROSION POTENTIAL WATERSHED

EXISTING RANGE FACILITIES
- DEVELOPED SPRING
- RESERVOIR
- ROAD
- WAY
- FENCE

DOMESTIC LIVESTOCK & WATERSHED

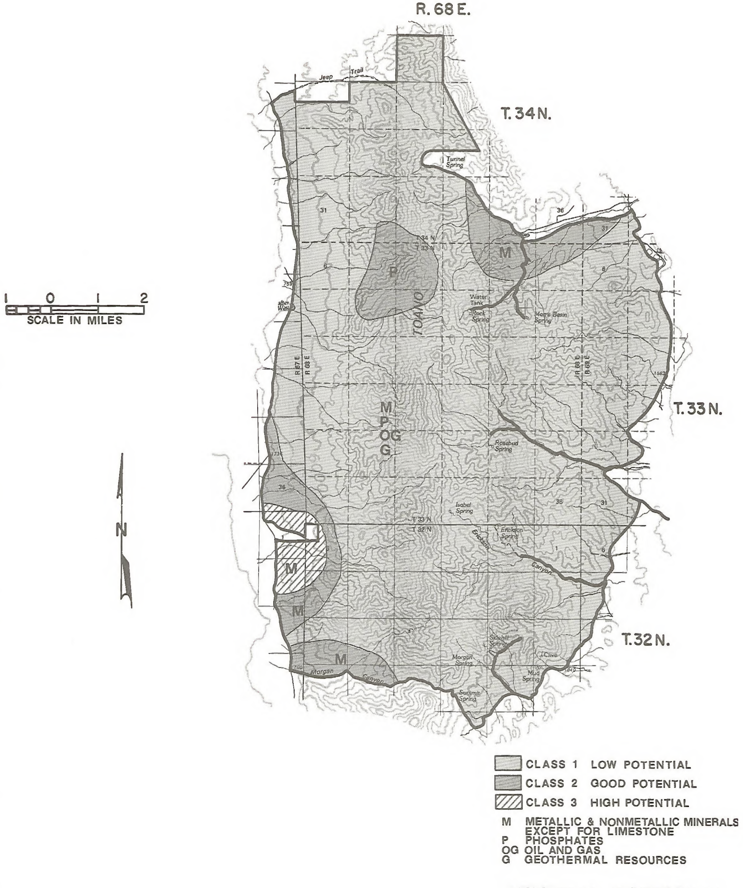
BLUEBELL NV-010-027



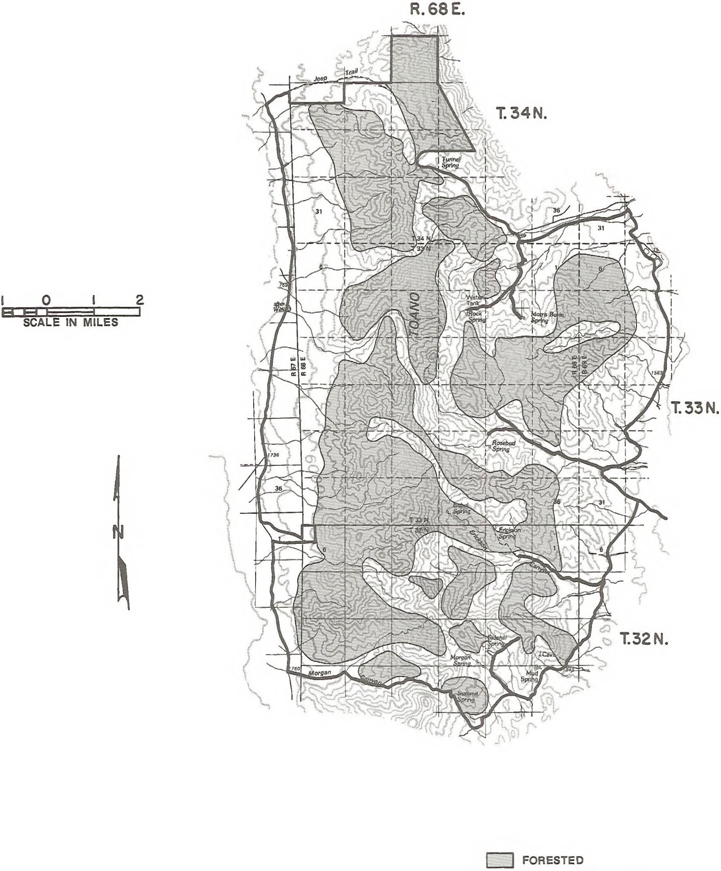
MINING CLAIMS

MINERAL LEASES

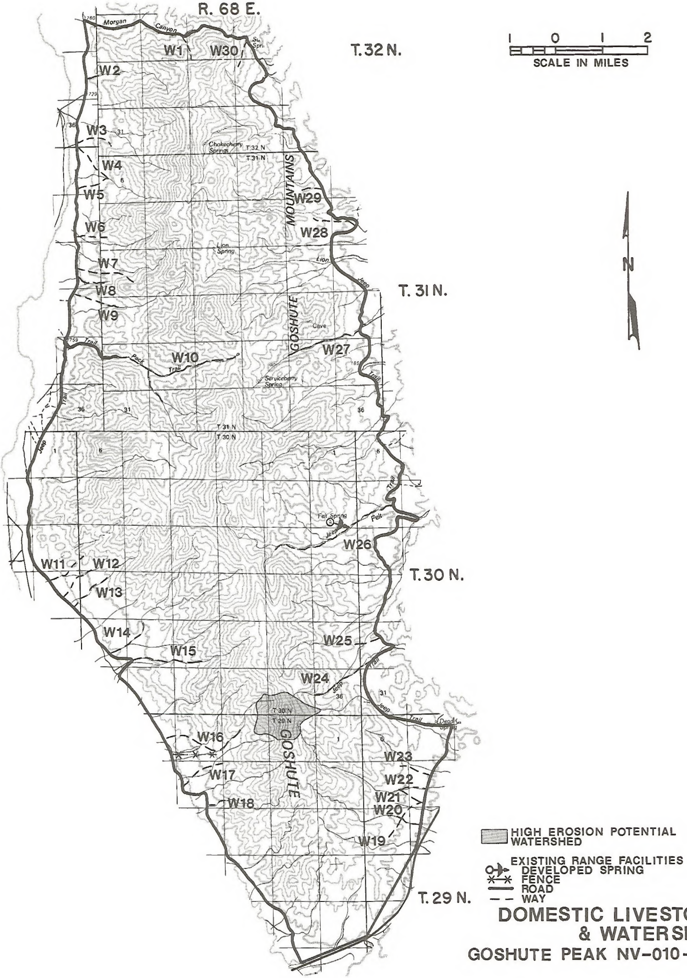
BLUEBELL NV-010-027



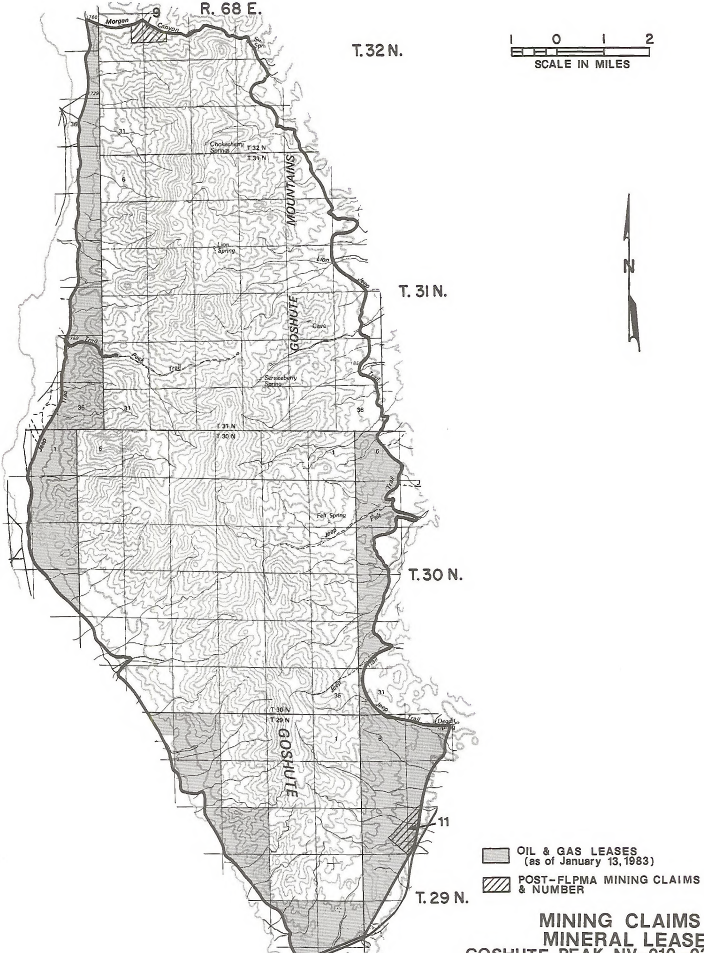
MINERAL POTENTIAL
BLUEBELL NV-010-027



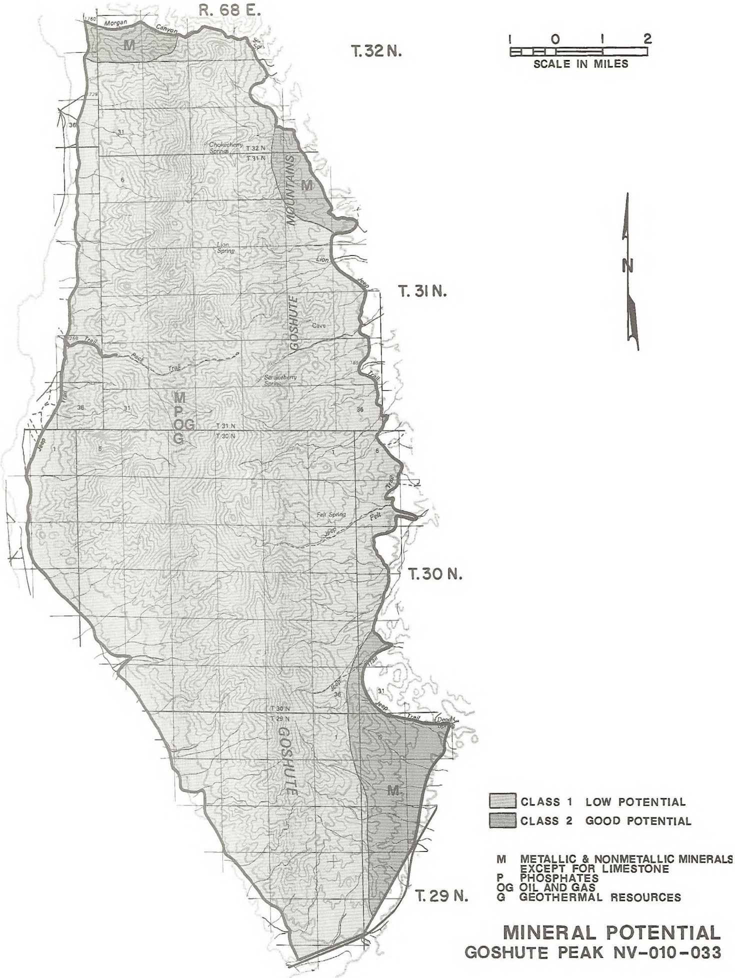
WOODLAND
BLUEBELL NV-010-027



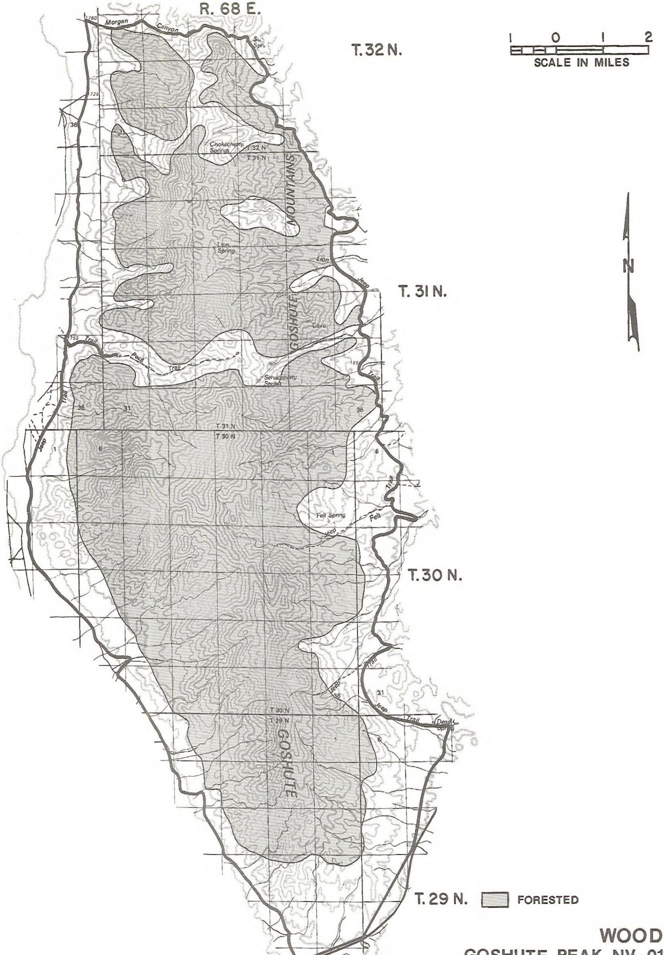
DOMESTIC LIVESTOCK & WATERSHED
GOSHUTE PEAK NV-010-033



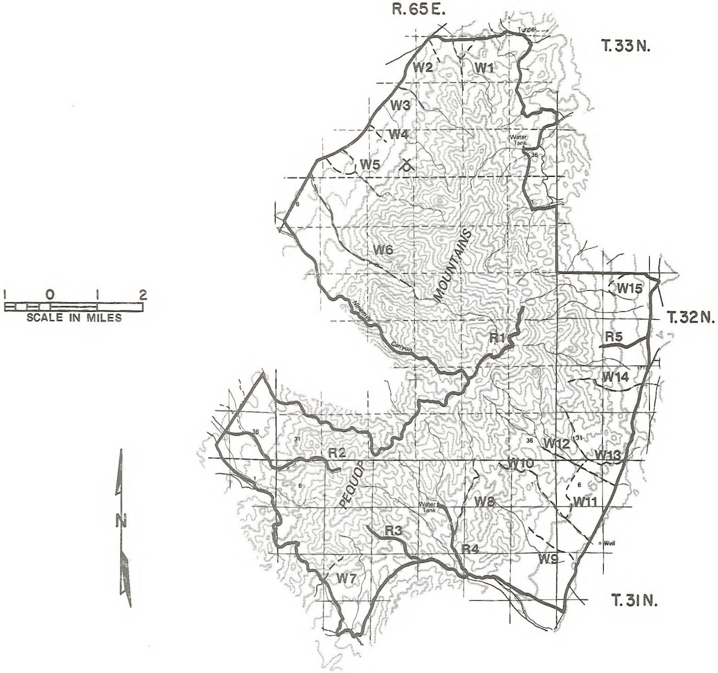
MINING CLAIMS &
MINERAL LEASES
GOSHUTE PEAK NV-010-033



MINERAL POTENTIAL
GOSHUTE PEAK NV-010-033



WOODLAND
GOSHUTE PEAK NV-010-033

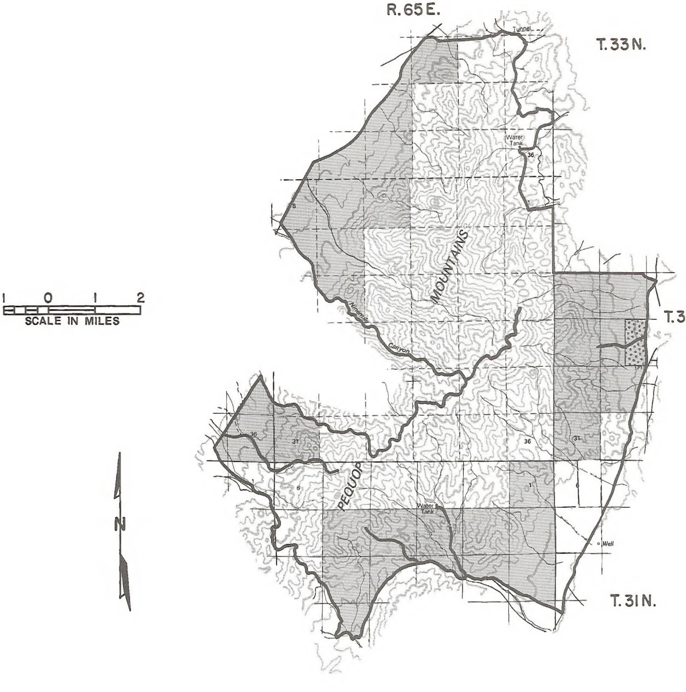


NO HIGH EROSION POTENTIAL WATERSHED

EXISTING RANGE FACILITIES
WELL

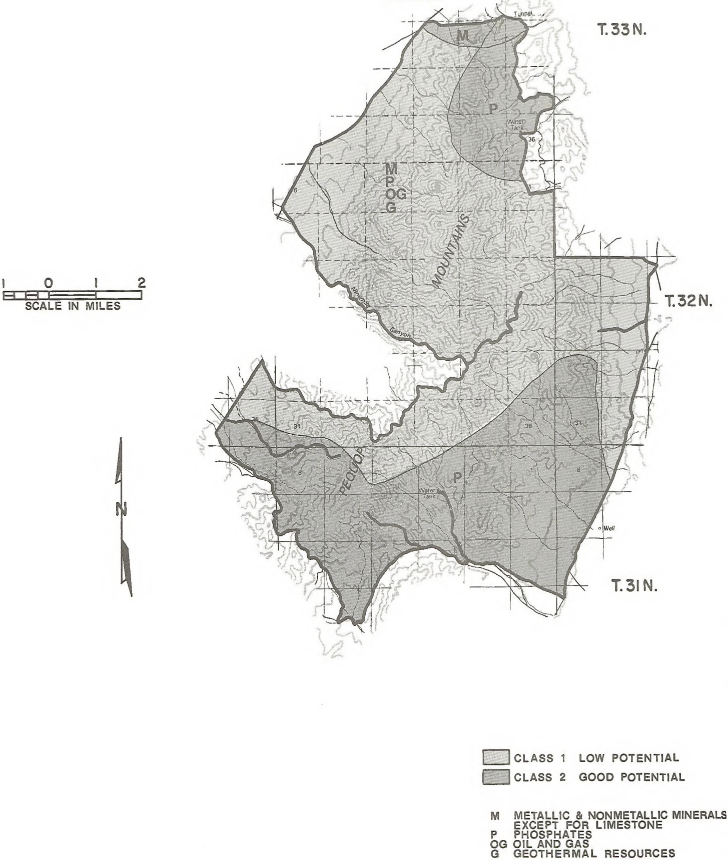
— ROAD
– – WAY

DOMESTIC LIVESTOCK & WATERSHED
SOUTH PEQUOP NV-010-035

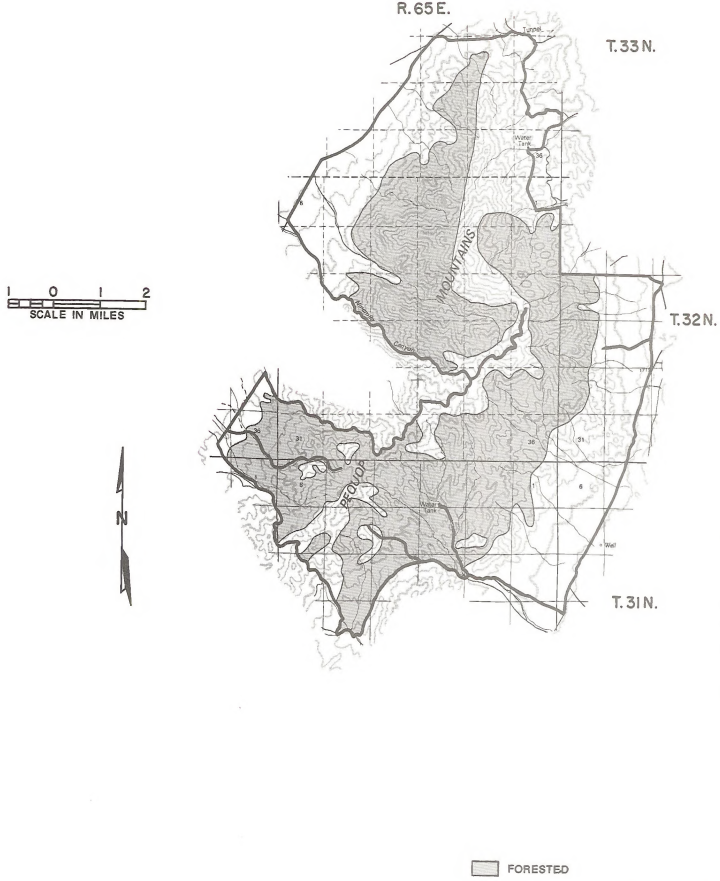


▨ OIL & GAS LEASES
(as of January 13, 1983)

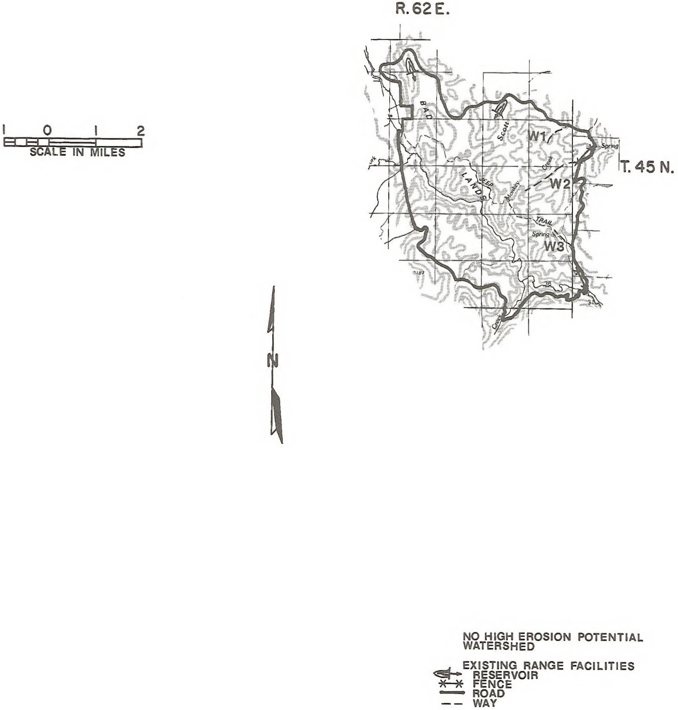
MINING CLAIMS & MINERAL LEASES
SOUTH PEQUOP NV-010-035



MINERAL POTENTIAL
SOUTH PEQUOP NV-010-035

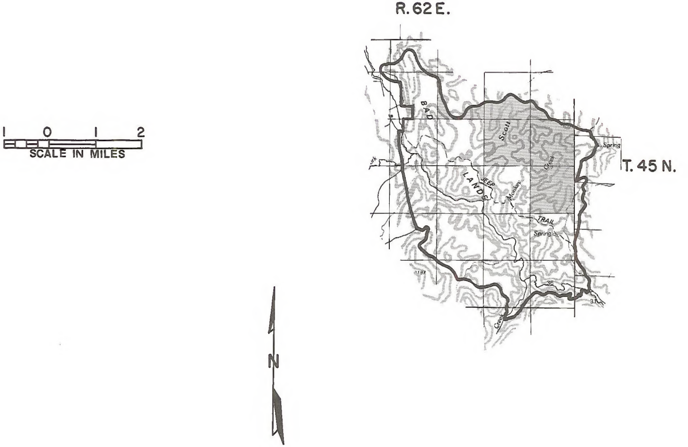


WOODLAND
SOUTH PEQUOP NV-010-035



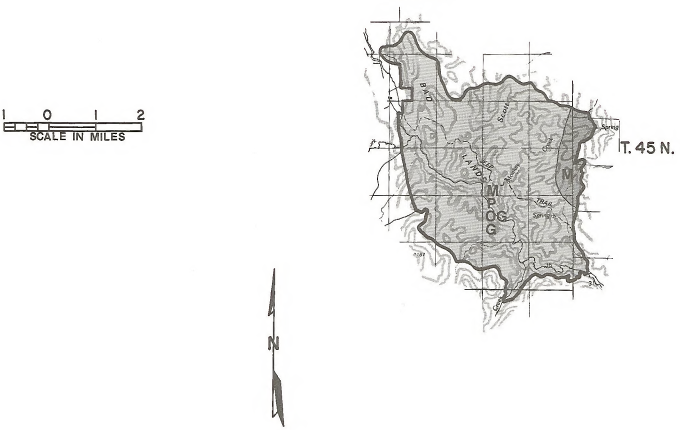
DOMESTIC LIVESTOCK & WATERSHED

BAD LANDS NV-010-184



▨ OIL & GAS LEASES
(as of January 13, 1983)

MINING CLAIMS & MINERAL LEASES
BAD LANDS NV-010-184



▨ CLASS 1 LOW POTENTIAL

■ CLASS 2 GOOD POTENTIAL

M METALLIC & NONMETALLIC MINERALS EXCEPT FOR LIMESTONE
P PHOSPHATES
OG OIL AND GAS
G GEOTHERMAL RESOURCES

MINERAL POTENTIAL
BAD LANDS NV-010-184

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

BLUEBELL WSA (NV-010-027)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 41,324 acres of the Bluebell WSA would be recommended suitable for wilderness designation and 14,341 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources, the harvest of woodland products and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 41,324 acres recommended suitable for wilderness designation would receive the special long-term protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 13 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 310 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, five cherrystem roads and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, wilderness values would be adversely impacted.

An open pit precious metals mine would be developed in the suitable area in Erickson Canyon. Activities associated with the mine would include 20 miles of new road construction (50 acres), tailings (20 acres), waste dumps (50 acres), heap leach pads (40 acres), site facilities (20 acres) and the open pit (20 acres). Mining activities would cause surface disturbance over a 300 acre area. This mining activity would adversely impact wilderness values in the Erickson Canyon area. The natural landscape and opportunities for solitude and primitive recreation in the Erickson Canyon area would be lost. There would be no impacts to wilderness values as the result of hazardous waste since the mining operation would be required to contain all hazardous materials in accordance with state and federal regulations.

The 14,341 acres not designated wilderness, including 7 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 170 visitor days annually for the foreseeable future. About 2 miles of road (3 acres) would be built in this area to explore for precious metals, and oil and gas exploration would result in 20 miles of seismic lines (19 acres). Wood cutting would result in the annual removal of 155 Christmas trees and 125 cords of firewood. Approximately 60% of the trees would be removed over a 45 acre area annually. Although 40% of the trees would be left, vegetative screening would be reduced. The presence of stumps would result in the loss of naturalness. Sights and sounds from woodcutting activities would cause a loss in solitude. It is estimated that, over the long-term, naturalness and opportunities for solitude would be lost on 2,400 acres.

> Conclusion. On the 41,324 acres designated as wilderness, naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained except in the Erickson Canyon area. An open pit mine in the Erickson Canyon area would result in the loss of naturalness on 300 acres due to surface disturbance associated with the mining operation. Sights and sounds from the mining operation would result in the loss of solitude on 5,000 acres. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads solitude would be locally impacted by vehicle travel.
>
> On the 14,341 acres not designated as wilderness, naturalness would be lost on 22 acres due to 2 miles of mining exploration roads (3 acres) and 10 miles of seismic lines (10 acres). Naturalness and opportunities for solitude would be lost over a 2400 acre area due to harvesting of Christmas trees and firewood.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 41,324 acres and 13 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 310 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 14,341 acres not designated wilderness would remain open to ORV use.

> Conclusion. Recreational ORV use would be eliminated on the 41,324 acres designated wilderness and 310 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 14,341 acres not designated wilderness, recreational ORV use would continue.

Impacts on Development of Mineral Resources

The 41,324 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. An open pit precious metals mine would be developed in the Erickson Canyon area. Activities associated with exploration and development include 20 miles of new road construction, the open pit, tailings, waste dumps, heap leach pads and site facilities. Surface disturbance associated with these activities is estimated to be 300 acres. Thirty miles of seismic exploration lines along the eastern border of the suitable area would be precluded by wilderness designation.

The 14,341 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and mineral leasing. The area of high potential for metallics is anticipated to receive 2 miles of exploration roads and 20 drill pads. Exploration for oil and gas is expected to result in 10 miles of seismic lines. These activities are not predicted to result in an economic discovery leading to development.

> Conclusions. Exploration for mineral resources would be precluded on the 41,324 acres recommended for wilderness designation. This includes 30 miles of seismic lines along the eastern border of the suitable area. An open pit precious metals mine would be developed in the suitable area including 20 miles of new roads, tailings, waste dumps, heap leach pads and the pit.
>
> The 14,341 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is expected to occur along the western portion resulting in 10 miles of seismic lines.

Impacts on Woodland Products Harvest

Woodlands within the resource produce an estimated 3,500 Christmas trees and 6,750 cords of firewood that can be harvested annually and still maintain the resource. Public demand for Christmas trees exceeds supply and demand for firewood is expected to exceed supply in the foreseeable future. The suitable area is estimated to produce an annual uield of 445 Christmas trees and 350 cords of firewood. Wilderness designation would preclude this harvest, reducing the resource area annual harvest by approximately 13% for Christmas trees and 5% for firewood.

Harvest on the nonsuitable area would not be impacted. The area would continue to be harvested at the annual yield of 155 Christmas trees and 125 cords of firewood.

> Conclusion: Wilderness designation would preclude the harvest of woodland products in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 13% (445 trees) and firewood by 5% (350 cords).

Adverse Impacts Which Cannot Be Avoided

On the 41,324 acres designated wilderness, the only unavoidable adverse impacts would be the loss of entry to minerals.

On the 14,341 acres designated nonwilderness, the unavoidable adverse impacts would be those associated with the loss of wilderness values from mineral exploration, ORV use and woodland product harvest. Some of these impacts may be reduced by careful examination and mitigating stipulations in approved Notices of Intent and Plans of Operations.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity.

On the 41,324 acres designated wilderness, the wilderness values would be protected, except in areas of valid discoveries.

On the 14,341 acres not designated wilderness, all present uses would continue. Motorized recreational use, mineral exploration and woodland product harvest would reduce wilderness values.

Irreversible and Irretrievable Commitments of Resources

On the 41,324 acres designated wilderness, no irreversible or irretrievable commitments of wilderness values is expected, except in areas of valid discoveries.

On the 14,341 acres designated nonwilderness, mineral exploration and woodland product harvest would create an irreversible commitment of wilderness resources.

All Wilderness Alternative

Under the All Wilderness Alternative, all 55,665 acres of public land in the Bluebell WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the elimination of woodland product harvest, mineral withdrawal, and ORV closure in the designated wilderness and the resulting effects on woodland product and mineral development, recreational ORV use, and the protection of wilderness values.

Impacts on Wilderness Values

Under the All Wilderness Alternative all 55,665 acres of the Bluebell WSA would be recommended suitable for wilderness designation and all wilderness values would be protected over the long-term. Wilderness values of naturalness, opportunities for solitude, and the supplemental features of diversity of wildlife, and vistas would be retained in the majority of the WSA. An open pit mine would be developed in the Erickson Canyon area resulting in 300 acres of surface disturbance. Naturalness would be lost in this area. Sights and sounds from the mining operation would result in a loss of opportunities for solitude and primitive and unconfined recreation on approximately 5,000 acres (10%) in the Erickson Canyon area.

Wilderness designation would close the entire 55,665 acres of the Bluebell WSA to all forms of woodland product harvest and recreational ORV use. Opportunities for solitude and primitive and unconfined recreation would be enhanced along vehicle ways. Vegetative screening would not be reduced by woodcutting. Motorized vehicle use would continue along cherrystem roads and boundary roads resulting in local impacts to solitude. Wilderness values in the vicinity of cherrystem roads and boundary roads would be adversely impacted due to uncontrolled motorized use.

> Conclusion. Wilderness values of naturalness and opportunities for solitude and primitive recreation would be retained within the Bluebell WSA, except in the Erickson Canyon area and along the immediate vicinity of cherrystem roads and boundary roads.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 55,665 acre Bluebell WSA to all forms of recreational ORV use. Recreational ORV use of approximately 480 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use forgone in the WSA would be absorbed on surrounding public lands.

> Conclusion. Recreational ORV use of 480 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

Impacts on Development of Mineral resources

All lands within the Bluebell WSA would be withdrawn from mineral entry. Exploration for precious metals, including 2 miles of roads and 20 drill pads would be precluded. Due to the absence of a known economic discovery, it is not predicted that any development of these minerals would be foregone. A precious metals open pit mine would be developed in the Erickson Canyon area.

All lands within the WSA would be withdrawn from mineral leasing. Exploration for oil and gas resources would be foregone. Forty miles of seismic lines would be precluded. Based on historic Nevada success ratios, no oil or gas discoveries are predicted to be foregone.

> Conclusion. Oil and gas exploration activities in the Bluebell WSA would be foregone. Exploration for precious metals would be foregone. A precious metals open pit mine would be developed in Erickson Canyon.

Impacts on Woodland Product Harvest

The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 475 cords of firewood per year would be foregone, reducing the resource area's annual harvest of Christmas trees by 17% and firewood by 7%.

> Conclusion. The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 475 cords of firewood per year would be foregone, reducing the resource area's annual harvest of Christmas trees by 17% and firewood by 7%.

No Wilderness Alternative

Under the proposed action, the entire 55,665 acres of the Bluebell WSA would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the harvest of woodland products, recreational ORV use and development of mineral resources, and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be open to mineral entry and leasing. All potential mineral resources would be available for exploration and development. The only development anticipated is an open pit precious metals mine in the Erickson Canyon area resulting in 300 acres of surface disturbance. Exploration for precious metals is expected to occur in the high potential area resulting in 2 miles of additional roads. No development is anticipated. Exploration for oil and gas is expected to occur along the western and eastern borders of the WSA resulting in 40 miles of seismic lines. No development is anticipated. These activities would result in loss of naturalness. Sights and sounds from traffic and construction related to mineral development would lower the quality of solitude in the WSA. Outstanding opportunities for solitude would be lost.

Sights and sounds from the collection of 600 Christmas trees and 475 cords of firewood per year would have an adverse impact on solitude and naturalness. On over the long-term, harvesting of Christmas trees and firewood would occur on approximately 9,300 acres. Woodcutting would reduce the vegetative screening. The sound of chainsaws would interrupt the feeling of solitude within the WSA. Stumps and slash would also be evident in the WSA, affecting naturalness.

ORV use is estimated to be about 240 visitor days annually and is expected to remain below 480 visitor days annually for the foreseeable future. Motorized use would continue on the ways throughout the WSA. Sights and sounds from recreational off-road vehicle use would have an adverse impact on solitude and primitive and unconfined recreation opportunities.

> Conclusion. The Bluebell WSA's wilderness values of naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be lost due to woodcutting, ORV use and minerals exploration and development.

Impacts on Recreational Off-Road Vehicle Use

The WSA would remain open to ORV use. Recreational ORV use is expected to increase to 480 visitor days annually for the foreseeable future.

> Conclusion. There would be no impact on recreational ORV use.

Impacts on Development of Mineral Resources

All lands within the WSA would remain open for mineral entry. All potential mineral resources would be available for exploration and development. An open pit mine would be developed in Erickson Canyon and exploration for precious metals would occur in the high potential area.

All lands within the WSA would remain open for mineral leasing. Exploration for oil and gas would occur on the western and eastern portions of the WSA and would result in forty miles of seismic exploration lines. No oil and gas discoveries are predicted based on historic success ratios in Nevada.

> Conclusion. There would be no impact on mineral exploration and development in the Bluebell WSA.

Impacts on Woodland Product Harvest

The entire WSA would be open to harvest. Up to 600 Christmas trees and 475 cords of firewood per year would be harvested.

> Conclusion. There would be no impact on woodland product harvest in the Bluebell WSA.

Alternative A (Partial Wilderness Designation)

Under this alternative Action, 25,830 acres of the Bluebell WSA would be recommended suitable for wilderness designation and 29,835 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources, the harvest of woodland products and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 25,830 acres recommended suitable for wilderness designation would receive the special long-term protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 5 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 120 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, three cherrystem roads and the southern boundary road would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

An open pit precious metals mine would be developed in the suitable area in Erickson Canyon. Mining activities would cause surface disturbance over a 300 acre area. The natural landscape on 300 acres and opportunities for solitude and primitive recreation on 5000 acres in the Erickson Canyon area would be lost.

The 29,835 acres not designated wilderness, including 15 miles of vehicle ways, would remain open for recreational ORV use. About 2 miles of road (3 acres) would be built in this area to explore for precious metals, and oil and gas exploration would result in 40 miles of seismic lines (39 acres) along the eastern and western borders of the WSA totalling 42 acres of surface disturbance. Wood cutting would result in the annual removal of 325 Christmas tree and 255 cords of firewood. These actions would reduce the naturalness and opportunities for solitude and primitive and unconfined recreation.

Conclusion. The 25,830 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, solitude would be adversely impacted due to continue use of motorized vehicles. Wilderness values that exist in the Erickson Canyon area would be lost on 5000 acres due to the development of an open pit mine.

On the 29,835 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities, and harvest of woodland products.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 25,830 acres and 5 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 120 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 29,835 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 360 visitor days annually for the foreseeable future.

Conclusion. Recreational ORV use would be eliminated on the 25,830 acres designated wilderness and 120 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 29,835 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 360 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 25,830 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. An open pit precious metals mine would be developed in the Erickson Canyon area. Activities associated with exploration and development of the mine include four miles on new road construction, the open pit, tailings, waste dumps and heap leach pads. Surface disturbance associated with these activities is estimated to be 300 acres.

No other exploration or development of mineral resources is anticipated and none would be foregone.

The 29,835 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and mineral leasing. The area of high mineral potential for metallics is anticipated to receive 2 miles of exploration roads and 20 drill pads. This is not predicted to result in an economic discovery leading to development.

Conclusions. In the 25,830 acres recommended suitable an open pit precious metals mine in the Erickson Canyon area would be developed including 20 miles of new roads, tailings, waste dumps, heap leach pads and the pit.

The 29,835 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is expected to result in 40 miles of seismic lines along the western and eastern borders of the WSA.

Impacts on Woodland Products Harvest

Harvest of up to 275 Christmas trees and 220 cords of firewood would be foregone in the suitable area, reducing the resource area's, total annual harvest for Christmas trees by 8% and for firewood by 3%.

Conclusion: Harvest of up to 275 Christmas trees and 220 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest for Christmas trees by 8% and for firewood by 3%.

Alternative B (Partial Wilderness Designation)

Under Alternative B, 48,308 acres of the Bluebell WSA would be recommended suitable for wilderness designation and 7,357 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources, the harvest of woodland products and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 48,308 acres recommended suitable for wilderness designation would receive the special long-term protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 17 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 400 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation slightly because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, five cherrystem roads in the WSA and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

An open pit precious metals mine would be developed in the suitable area in Erickson Canyon. Activities associated with the mine would include 20 miles of new road construction, tailing, waste dumps, heap leach pads and the open pit. Mining activities would cause surface disturbance over a 300 acre area. This mining activity would adversely impact naturalness and solitude on 5000 acres in the Erickson Canyon area. The natural landscape and opportunities for solitude and primitive recreation in the Erickson Canyon area would be lost.

The 7,357 acres not designated wilderness, including 3 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 80 visitor days annually for the foreseeable future. About 2 miles of road would be built in this area to explore for precious metals, and oil and gas exploration would result in 20 miles of seismic lines. Wood cutting in the area would result in the annual removal of 80 Christmas tree and 60 cords of firewood. These actions would reduce the naturalness and opportunities for solitude and primitive recreation.

> Conclusion. The majority of the 48,308 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, continued motorized vehicle use would impact solitude.
>
> On the 7,357 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities, and harvest of woodland products.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 48,308 acres and 17 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 400 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 7,357 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 80 visitor days annually for the foreseeable future.

> Conclusion. Recreational ORV use would be eliminated on the 48,308 acres designated wilderness and 400 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible.

Impacts on Development of Mineral Resources

The 48,308 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. An open pit precious metals mine would be developed in the Erickson Canyon area. Activities associated with exploration and development include 20 miles on new road construction, the open pit, tailings, waste dumps and heap leach pads.

Surface disturbance associated with these activities is estimated to be 300 acres. Forty miles of seismic exploration lines along the eastern and western borders of the suitable area would be foregone.

The 7,357 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry an mineral leasing. The area of high potential for metallics, is anticipated to receive 2 miles of exploration roads and 20 drill pads. This is not predicted to result in an economic discovery leading to development.

> Conclusions. Exploration for mineral resources would be precluded on the 48,308 acres recommended for wilderness designation. This includes 40 miles of seismic lines along the eastern and western borders of the suitable area. An open pit precious metals mine would be developed in the Erickson Canyon area.
>
> The 7,357 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is not expected to occur in this area.

Impacts on Woodland Products Harvest

Harvest of up to 520 Christmas trees and 415 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% and firewood by 6%. Harvest in the nonsuitable area would not be impacted and is expected to reach 80 Christmas trees and 60 cords of firewood annually.

> Conclusion: Harvest of up to 520 Christmas trees and 415 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% and firewood by 6%. Harvest in the nonsuitable area would not be impacted and is expected to reach 80 Christmas trees and 60 cords of firewood annually.

GOSHUTE PEAK WSA (NV-010-033)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 61,004 acres of the Goshute Peak WSA would be recommended suitable for wilderness designation and 8,766 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the exploration for mineral resources, the harvest of woodland products, and recreational ORV use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 61,004 acres recommended suitable for wilderness designation would receive the special long-term legislative protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 21 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 960 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, one cherrystem roads and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

The 8,766 acres not designated wilderness, including 6 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 240 visitor days annually for the foreseeable future. About 2 miles of road and 120 drill pads (15 acres) would be built in this area to explore for precious metals, and oil and gas exploration would result in 10 miles (10 acres) of seismic lines. Wood cutting would result in the annual removal of 80 Christmas tree and 100 cords of firewood. Approximately 60% of the trees would be removed over a 75 acres area annually. Although 40% of the trees would be left, vegetative screening would be reduced. The presence of stumps would result in the loss of naturalness. Sights and sounds from woodcutting activities would cause a loss in solitude. It is estimated that, over the long-term, naturalness and opportunities for solitude would be lost on 2,000 acres of woodlands.

> Conclusion. On the 61,004 acres designated as wilderness naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, continued use of motorized vehicles would adversely impact solitude.
>
> On the 8,766 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities and harvest of woodland products.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 61,004 acres and 21 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 960 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 8,766 acres not designated wilderness including 6 miles of ways and 12 miles of new mining roads would remain open to ORV use. Recreational ORV use levels would increase but remain under 240 visitor days annually for the foreseeable future.

> Conclusion. Recreational ORV use would be eliminated on the 61,004 acres designated wilderness and 960 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be

negligible. On the 8,766 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 240 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 61,004 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. No exploration or development of precious metals would be foregone in this area due to the absence of known economic deposits. Exploration for oil and gas would be foregone. Three miles of seismic lines would be precluded.

The 8,766 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry an mineral leasing. Exploration for precious metals is expected to result in 12 miles of new road construction and 120 drill pads. These are not predicted to result in an economic discovery leading to development.

Exploration for oil and gas is expected to result in seven miles of seismic lines. This would not lead to development.

Conclusions. Exploration for oil and gas would be precluded on the 61,004 acres recommended for wilderness designation. Three miles of seismic lines along the southeastern border of the suitable area would be precluded.

The 8,766 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 12 miles of exploratory access roads and 120 drill pads. Exploration for oil and gas is expected to result in seven miles of seismic lines.

Impacts on Woodland Products Harvest

Woodlands within the resource produce an estimated 3,500 Christmas trees and 6,750 cords of firewood that can be harvested annually and still maintain the resource. Public demand for Christmas trees exceeds supply and demand for firewood is expected to exceed supply in the foreseeable future. The suitable area is estimated to produce an annual yield of 520 Christmas trees and 670 cords of firewood. Wilderness designation would preclude this harvest, reducing the resource area annual harvest by approximately 15% for Christmas trees and 10% for firewood.

Harvest on the nonsuitable area would not be impacted. The area would continue to be harvested at the annual yield of 80 Christmas trees and 100 cords of firewood.

Conclusion: Wilderness designation would preclude the harvest of woodland products in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 15% (520 trees) and firewood by 10% (670 cords).

Adverse Impacts Which Cannot Be Avoided

On the 61,004 acres designated wilderness, the only unavoidable adverse impacts would be the loss of entry to minerals.

On the 8,766 acres designated nonwilderness, the unavoidable adverse impacts would be those associated with the loss of wilderness values from mineral exploration, ORV use and woodland product harvest. Some of these impacts may be reduced by careful examination and mitigating stipulations in approved Notices of Intent and Plans of Operations.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity.

On the 61,004 acres designated wilderness, the wilderness values would be protected, except in areas of valid discoveries.

On the 8,766 acres not designated wilderness, all present uses would continue. Motorized recreational use, mineral exploration and woodland product harvest would reduce wilderness values over the long-term.

Irreversible and Irretrievable Commitments of Resources

On the 61,004 acres designated wilderness, no irreversible or irretrievable commits of wilderness values is expected, except in areas of valid discoveries.

On the 8,766 acres designated nonwilderness, mineral exploration and woodland product harvest would create an irreversible commitment of wilderness resources.

All Wilderness Alternative

Under the All Wilderness Alternative, all 69,770 acres of public land in the Goshute Peak WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the elimination of woodland product harvest, mineral withdrawal, and ORV closure in the designated wilderness and the resulting effects on woodland product and mineral development, recreational ORV use, and the protection of wilderness values.

Impacts on Wilderness Values

All 69,770 acres of the Goshute Peak WSA would be protected over the long-term. Wilderness values of naturalness, opportunities for solitude and primitive and unconfined recreation would be retained.

Wilderness designation would close the entire Goshute Peak WSA to all forms of woodland product harvest and recreational ORV use. This action would eliminate approximately 1200 visitor days of recreational ORV that are projected to occur annually in the area and preclude the harvest of 600 Christmas trees and 770 cords of firewood. This would improve the area's naturalness, solitude and primitive and unconfined recreation. Solitude in the immediate vicinity of cherrystem roads and boundary roads would be adversely impacted due to uncontrolled motorized use.

Conclusion. Wilderness values of naturalness and opportunities for solitude and primitive recreation would be retained in the Goshute Peak WSA, except along cherrystem roads and boundary roads wilderness values would be adversely impacted by motorized access.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 69,770 acre Goshute Peak WSA to all forms of recreational ORV use. Recreational ORV use of approximately 1200 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use forgone in the WSA would be absorbed on surrounding public lands.

Conclusion. Recreational ORV use of 1200 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

Impacts on Development of Mineral resources

All lands within the Goshute Peak WSA would be withdrawn from mineral entry. Exploration for precious metals, including 12 miles of roads and 120 drill pads would be precluded. Due to the absence of a known economic discovery, it is not predicted that any development of these minerals would be foregone.

All lands within the WSA would be withdrawn from mineral leasing. Exploration for oil and gas resources would be precluded. Ten miles of seismic lines would be precluded. Based on historic Nevada success ratios, no oil or gas discoveries are predicted to be foregone.

Conclusion. There would be impacts to mineral exploration activities in the Goshute Peak WSA. Exploration for precious metals as well as oil and gas would be foregone.

Impacts on Woodland Product Harvest

The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 770 cords of firewood per year would be foregone, reducing the resource area's total annual harvest for Christmas trees by 17% and firewood by 11%.

Conclusion. The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 600 Christmas trees and 770 cords of firewood per year would be foregone, reducing the resource area's total annual harvest for Christmas trees by 17% and firewood by 11%.

No Wilderness Alternative

Under the proposed action, the entire 69,770 acres of the Goshute Peak WSA would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the harvest of woodland products, recreational ORV use and development of mineral resources, and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be open to mineral entry and leasing. All potential mineral resources would be available for exploration and development. Exploration for precious metals is expected to occur in the northwest and southeast portion of the WSA resulting in 12 miles of new road disturbing 15 acres. Exploration for oil and gas is expected to occur along the western and eastern borders of the WSA resulting in 10 miles of seismic lines and disturbing 10 acres. These activities would result in loss of naturalness on 25 acres. Sights and sounds from traffic and construction related to mineral exploration would lower the quality of solitude in the WSA. Outstanding opportunities for solitude would be lost in these areas.

Sights and sounds from the collection of 600 Christmas trees and 770 cords of firewood per year would have an adverse impact on solitude and naturalness. The sound of chainsaws would interrupt the feeling of solitude within the WSA. Stumps and slash would also be evident in the WSA, affecting naturalness on approximately 15,100 acres over the long-term.

ORV use is estimated to be about 640 visitor days annually and is expected to remain below 1200 visitor days annually for the foreseeable future. Motorized use would continue on the ways throughout the WSA. Sights and sounds from recreational off-road vehicle use would have an adverse impact on solitude and primitive and unconfined recreation opportunities.

> Conclusion. The Goshute Peak WSA's wilderness values of naturalness, and outstanding opportunities for solitude and primitive and unconfined recreation would be lost over the long-term due to mineral exploration, woodcutting and ORV use.

Impacts on Recreational Off-Road Vehicle Use

The WSA would remain open to ORV use. Recreational ORV use is expected to increase to 1200 visitor days annually for the foreseeable future.

> Conclusion. There would be no adverse impact on recreational ORV use.

Impacts on Development of Mineral Resources

All lands within the WSA would remain open for mineral entry. All potential mineral resources would be available for exploration and development. Exploration for precious metals would occur resulting in 12 miles of new roads. Due to the absence of any known economic deposits development is not expected.

All lands within the WSA would remain open for mineral leasing. Exploration for oil and gas would occur on the western and eastern portions of the WSA and would result in 10 miles of seismic exploration lines. No oil and gas discoveries are predicted based on historic success ratios in Nevada.

> Conclusion. There would be no impact on exploration for mineral resources in the Goshute Peak WSA.

Impacts on Woodland Product Harvest

The entire WSA would be open to harvest. Up to 600 Christmas trees and 770 cords of firewood per year would be harvested.

> Conclusion. There would be no impact on woodland product harvest in the Goshute Peak WSA.

Alternative A (Partial Wilderness Designation)

Under this alternative, 45,618 acres of the Goshute Peak WSA would be recommended suitable for wilderness designation and 24,152 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources, the harvest of woodland products, recreational ORV use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 45,618 acres recommended suitable for wilderness designation would receive the special long-term protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 12 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 530 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, one cherrystem road and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

The 24,152 acres not designated wilderness, including 15 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 670 visitor days annually for the foreseeable future. About 12 miles of road (15 acres) would be built in this area to explore for precious metals, and oil and gas exploration would result in 10 miles (10 acres) of seismic lines, disturbing a total of 25 acres. Wood cutting would result in the annual removal of 65 Christmas tree and 100 cords of firewood. These actions would reduce the naturalness and opportunities for solitude and primitive recreation over an area of approximately 15,700 acres.

> Conclusion. On the 45,618 acres designated as wilderness long-term naturalness, solitude and opportunities for primitive and unconfined recreation would be maintained. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads motorized vehicle use would impact solitude.

> On the 24,152 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, mineral exploration activities and harvest of woodland products.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 45,618 acres and 12 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 530 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 25,152 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 670 visitor days annually for the foreseeable future.

> Conclusion. Recreational ORV use would be eliminated on the 45,618 acres designated wilderness and 530 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 24,152 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 670 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 45,618 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. No exploration or development of mineral resources would be foregone as no economic deposits are known to occur in the suitable area.

The 24,152 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry an mineral leasing. Exploration for precious metals is anticipated to result in 12 miles of exploration roads and 120 drill pads. This is not predicted to result in an economic discovery leading to development.

Exploration for oil and gas would result in 10 miles of seismic lines but would not lead to development in the area.

> Conclusions. There would be no impact to exploration and development of mineral resources.

Impacts on Woodland Products Harvest

Harvest of up to 535 Christmas trees and 670 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas tree by 15% and firewood by 10%. Harvest in the nonsuitable area would not be impacted and is expected to reach 65 Christmas trees and 100 cords of firewood annually.

Conclusion: Harvest of up to 535 Christmas trees and 670 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas tree by 15% and firewood by 10%. Harvest in the nonsuitable area would not be impacted and is expected to reach 65 Christmas trees and 100 cords of firewood annually.

Alternative B (Partial Wilderness Designation)

Under Alternative B, 65,585 acres of the Goshute Peak WSA would be recommended suitable for wilderness designation and 4,185 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources, the harvest of woodland products, recreational ORV use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 65,585 acres recommended suitable for wilderness designation would receive the special long-term legislative protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 24 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 1060 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, one cherrystem road and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude values would be adversely impacted.

The 4,185 acres not designated wilderness, including 3 miles of vehicle ways and 10 miles of mining road, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 140 visitor days annually for the foreseeable future. About 10 miles of road (15 acres) would be built in this area to explore for precious metals, and oil and gas exploration would result in 3 miles (3 acres) of seismic lines disturbing a total of 18 acres. Wood cutting would not occur, as the nonsuitable area does not contain harvestable products. These actions would reduce the naturalness and opportunities for solitude and primitive recreation.

Conclusion. The 65,585 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. Solitude along boundary and cherrystem roads would be adversely impacted by continued motorized vehicle use.

On the 4,185 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be lost because of continued recreational ORV use and mineral exploration activities.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 65,585 acres and 24 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 1060 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 4,185 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 140 visitor days annually for the foreseeable future.

Conclusion. Recreational ORV use would be eliminated on the 65,585 acres designated wilderness and 1060 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 4,185 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 140 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 65,585 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. Exploration for precious metals would be foregone in northwest portion of the WSA, precluding 2 miles of new roads and 20 drill pads. Exploration for oil and gas would be foregone along the western boundary of the WSA, precluding 3 miles of seismic lines.

The 4,185 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry and mineral leasing. Exploration for precious metals, is anticipated to result in 10 miles of exploration roads and 100 drill pads. This is not predicted to result in an economic discovery leading to development.

Conclusions. Exploration for oil and gas and precious metals would be precluded on the 65,585 acres recommended for wilderness designation. This includes 7 miles of seismic lines and 10 miles of new roads along the southeastern border of the suitable area.

The 4,185 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 2 miles of exploratory access roads and 20 drill pads, and exploration for oil and gas is expected to result in 3 miles of seismic lines in the southeastern portion of the WSA.

Impacts on Woodland Products Harvest

Woodland products available for harvest only occur in the suitable portion of the WSA. Under this alternative all 600 Christmas trees and 770 cords of firewood would be precluded from harvest, reducing the resource area's total annual harvest of Christmas trees by 17% and firewood by 11%.

> Conclusion: Woodland products available for harvest only occur in the suitable portion of the WSA. Under this alternative all 600 Christmas trees and 770 cords of firewood would be precluded from harvest, reducing the resource area's total annual harvest of Christmas trees by 17% and firewood by 11%.

SOUTH PEQUOP WSA (NV-010-035)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 34,544 acres of the South Pequop WSA would be recommended suitable for wilderness designation and 6,546 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the development of mineral resources, the harvest of woodland products, recreational ORV use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 34,544 acres recommended suitable for wilderness designation would receive the special long-term protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 11 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 130 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation slightly because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, five cherrystem roads and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

The 6,546 acres not designated wilderness, including 9 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 110 visitor days annually for the foreseeable future. About 10 miles of road would be built in this area to explore for precious metals. No oil and gas exploration or development is anticipated. Wood cutting would not occur as all products are in the suitable area. These actions would reduce the naturalness and opportunities for solitude and primitive recreation.

Conclusion. The 34,544 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads, motorized use would adversely impact solitude.

On the 6,546 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use and mineral exploration activities.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 34,544 acres and 11 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 130 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 6,546 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 110 visitor days annually for the foreseeable future.

Conclusion. Recreational ORV use would be eliminated on the 34,544 acres designated wilderness and 130 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 6,546 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 110 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 34,544 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing.

The 6,546 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry an mineral leasing. Exploration for precious metals is anticipated to result in 10 miles of exploration roads and 20 drill pads. These are not predicted to result in an economic discovery leading to development.

Conclusions. There would be no impacts to exploration or development of mineral resources in the suitable area.

The 6,546 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in 10 miles of exploratory access roads and 20 drill pads. Exploration for oil and gas is not expected to occur.

Impacts on Woodland Products Harvest

Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. In the nonsuitable area there are no woodland products available for harvest.

> Conclusion: Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. In the nonsuitable area there are no woodland products available for harvest.

Adverse Impacts Which Cannot Be Avoided

On the 34,544 acres designated wilderness, the only unavoidable adverse impacts would be the loss of entry to minerals.

On the 6,546 acres designated nonwilderness, the unavoidable adverse impacts would be those associated with the loss of wilderness values from mineral exploration and ORV use. Some of these impacts may be reduced by careful examination and mitigating stipulations in approved Notices of Intent and Plans of Operations.

Relationship Between Local Short-Term Uses of Man's ENvironment and the Maintenance and Enhancement of Long-Term Productivity.

On the 34,544 acres designated wilderness, the wilderness values would be protected, except in areas of valid discoveries.

On the 6,546 acres not designated wilderness, all present uses would continue. Motorized recreational use and mineral exploration would reduce wilderness values.

Irreversible and Irretrievable Commitments of Resources

On the 34,544 acres designated wilderness, no irreversible or irretrievable commits of wilderness values is expected, except in areas of valid discoveries.

On the 6,546 acres designated nonwilderness, mineral exploration would create an irreversible commitment of wilderness resources.

All Wilderness Alternative

Under the All Wilderness Alternative, all 41,090 acres of public land in the South Pequop WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the elimination of woodland product harvest, mineral withdrawal, and ORV closure in the designated wilderness and the resulting effects on woodland product and mineral exploration and recreational ORV use.

Impacts on Wilderness Values

All 41,090 acres of the South Pequop WSA would be protected over the long-term by legislative mandate. Wilderness values of naturalness, opportunities for solitude, and the supplemental features of diversity of wildlife, and vistas would be retained in the the WSA.

Wilderness designation would close the entire 41,090 acres of the South Pequop WSA to all forms of woodland product harvest and recreational ORV use. This action would eliminate approximately 120 visitor days of recreational ORV that are estimated to occur annually in the area, and preclude the harvest of 400 Christmas trees and 385 cords of firewood. This would improve the area's opportunities for solitude and primitive and unconfined recreation. Solitude in the vicinity of cherrystem roads and boundary roads would be adversely impacted due to uncontrolled motorized use.

> Conclusion. Naturalness and opportunities for solitude and primitive and unconfined recreation would be maintained in the South Pequop WSA, except along cherrystem roads and boundary roads where uncontrolled motorized access would adversely impact solitude. In the immediate vicinity of closed ways solitude and naturalness would be enhanced.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire 41,090 acre South Pequop WSA to all forms of recreational ORV use. Recreational ORV use of approximately 240 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use forgone in the WSA would be absorbed on surrounding public lands.

> Conclusion. Recreational ORV use of 240 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

Impacts on Development of Mineral resources

All lands within the South Pequop WSA would be withdrawn from mineral entry. Exploration for precious metals, including 10 miles of roads and 20 drill pads would be precluded. Due to the absence of a known economic discovery, it is not predicted that any development of minerals would be foregone.

All lands within the WSA would be withdrawn from mineral leasing. It is not anticipated that exploration for oil and gas would be foregone.

> Conclusion. There would be impacts to exploration for precious metals in the South Pequop WSA. Exploration would be foregone, precluding 10 miles of new roads.

Impacts on Woodland Product Harvest

The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 400 Christmas trees and 385 cords of firewood per year would be foregone, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%.

Conclusion. The WSA would not be available for Christmas tree and firewood cutting. The harvest of up to 400 Christmas trees and 385 cords of firewood per year would be foregone, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%.

No Wilderness Alternative

Under this alternative, the entire 41,090 acres of the South Pequop WSA would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the harvest of woodland products, recreational ORV use and development of mineral resources, and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be open to mineral entry and leasing. All potential mineral resources would be available for exploration and development. The only mineral activity anticipated in the WSA is exploration for precious metals in the northern and eastern portions of the WSA, resulting in 15 acres of surface disturbance. This activity would result in loss of naturalness. Sights and sounds from traffic and construction related to mineral exploration would lower the quality of solitude in the WSA. Outstanding opportunities for solitude would be lost in these areas.

Sights and sounds from the collection of 400 Christmas trees and 385 cords of firewood per year would have an adverse impact on solitude and naturalness. Approximately 60% of the trees would be removed over a 38 acre area annually. Although 40% of the trees would be left, vegetative screening would be reduced. The presence of stumps would result in the loss of naturalness. Sights and sounds from woodcutting activities would cause a loss in solitude. It is estimated that, over the long-term, naturalness and opportunities for solitude would be lost on 7600 acres of woodlands.

ORV use is estimated to be about 120 visitor days annually and is expected to remain below 240 visitor days annually for the foreseeable future. Motorized use would continue on the ways throughout the WSA. Sights and sounds from recreational off-road vehicle use would have an adverse impact on solitude and primitive and unconfined recreation opportunities.

Conclusion. The South Pequop WSA's wilderness values of naturalness and outstanding opportunities for solitude and primitive and unconfined recreation would be lost due to minerals exploration, ORV use and woodcutting.

Impacts on Recreational Off-Road Vehicle Use

The WSA would remain open to ORV use. Recreational ORV use is expected to increase to 240 visitor days annually for the foreseeable future.

Conclusion. There would be no impact on recreational ORV use.

Impacts on Development of Mineral Resources

All lands within the WSA would remain open for mineral entry. All potential mineral resources would be available for exploration and development. Exploration for precious metals would occur in the northern and eastern portions of the WSA. This activity would result in 10 miles of new road construction and 20 drill pads, disturbing 15 acres.

All lands within the WSA would remain open for mineral leasing. Exploration for oil and gas is not expected to occur.

> Conclusion. There would be no impact on mineral resources activities in the South Pequop WSA.

Impacts on Woodland Product Harvest

The entire WSA would be open to harvest. Up to 400 Christmas trees and 385 cords of firewood per year would be harvested.

> Conclusion. There would be no impact on woodland product harvest in the South Pequop WSA.

Alternative A (Partial Wilderness Designation)

Under this Alternative, 37,573 acres of the South Pequop WSA would be recommended suitable for wilderness designation and 3,517 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the exploration for mineral resources, recreational ORV use and the harvest of woodland products and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

Wilderness values on the 37,573 acres recommended suitable for wilderness designation would receive the special long-term legislative protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 14.5 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 175 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation slightly because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, Four cherrystem roads and boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary and cherrystem roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

The 3,517 acres not designated wilderness, including 5.5 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 65 visitor days annually for the foreseeable future. About 2 miles of road would be built in this area to explore for precious metals. These actions would reduce the naturalness and opportunities for solitude and primitive recreation.

> Conclusion. The 37,573 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced. In the immediate vicinity of cherrystem roads and boundary roads motorized vehicle use would adversely impact solitude.
>
> On the 3,517 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use, and mineral exploration activities.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 37,573 acres and 14.5 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 175 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 3,517 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 65 visitor days annually for the foreseeable future.

> Conclusion. Recreational ORV use would be eliminated on the 37,573 acres designated wilderness and 175 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 3,517 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 65 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 37,573 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing. Exploration for precious metals consisting of two miles of roads and 4 drill pads would be foregone in the northern portion of the suitable area. No other minerals activities would be foregone in the suitable area.

The 3,517 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry an mineral leasing. Exploration for precious metals would result in eight miles of exploration roads and 16 drill pads. This is not predicted to result in an economic discovery leading to development.

Conclusions. Exploration for precious metals would be precluded on the 37,573 acres recommended for wilderness designation. Two miles of roads and 4 drill pads in northern portion of the suitable area would be precluded.

The 3,517 acres recommended as nonsuitable for wilderness designation would remain open to all forms of mineral entry and leasing. Exploration for precious metals is expected to result in eight miles of exploratory access roads and 16 drill pads. Exploration for oil and gas is not expected to occur.

Impacts on Woodland Products Harvest

Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. Harvest in the nonsuitable area would not occur as there are no harvestable product in this area.

Conclusion: Harvest of up to 400 Christmas trees and 385 cords of firewood would be foregone in the suitable area, reducing the resource area's total annual harvest of Christmas trees by 11% and firewood by 6%. Harvest in the nonsuitable area would not occur as there are no harvestable product in this area.

BAD LANDS WSA (NV-010-184)

Proposed Action (Partial Wilderness Designation)

Under the Proposed Action, 8,415 acres of the Bad Lands WSA would be recommended suitable for wilderness designation and 1,011 acres would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to the protection of wilderness values through designation.

Impacts on Wilderness Values

Wilderness values on the 8,415 acres recommended suitable for wilderness designation would receive the special long-term legislative protection provided by wilderness designation. The areas of the most spectacular scenery and outstanding opportunities for primitive recreation and naturalness would be retained.

The suitable portion of the WSA, including 2.5 miles of vehicle ways, would be closed to recreational ORV use. This action would eliminate approximately 100 visitor days of recreational ORV use that are projected to occur in the area. This would improve the area's naturalness and opportunities for solitude and primitive and unconfined recreation slightly because of the near elimination of surface disturbance and because visitors would not encounter or hear ORV users in the area. However, WSA boundary roads would be available for vehicle use by the public to access the wilderness area and by livestock operators to manage their livestock within the area. In the immediate vicinity of the boundary roads, where uncontrolled motorized use would occur, solitude would be adversely impacted.

The 1,011 acres not designated wilderness, including 0.5 miles of vehicle ways, would remain open for recreational ORV use. Recreational ORV use on this parcel would remain below 50 visitor days annually for the foreseeable future. These actions would reduce the naturalness and opportunities for solitude and primitive recreation over the long-term.

Conclusion. The 8,415 acres designated as wilderness would maintain long-term naturalness, solitude and opportunities for primitive and unconfined recreation. In the immediate areas of the closed ways, naturalness and solitude would be enhanced.

On the 1,011 acres managed for other than wilderness, naturalness and opportunities for solitude and primitive and unconfined recreation would be reduced because of continued recreational ORV use.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close 8,415 acres and 2.5 miles of vehicle ways to recreational ORV use. Recreational vehicle use of approximately 100 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational use forgone would be absorbed on surrounding public lands.

The 1,011 acres not designated wilderness would remain open to ORV use. Recreational ORV use levels would increase but remain under 50 visitor days annually for the foreseeable future.

Conclusion. Recreational ORV use would be eliminated on the 8,415 acres designated wilderness and 100 visitor days would be forgone annually. The impacts of shifting this use to other public lands would be negligible. On the 1,011 acres not designated wilderness, recreational ORV use would continue to increase but would not exceed 50 visitor days annually for the foreseeable future.

Impacts on Development of Mineral Resources

The 8,415 acres recommended as suitable for wilderness designation would be withdrawn from all forms of mineral entry and mineral leasing.

The 1,011 acres recommended as nonsuitable for wilderness designation would remain open for mineral entry an mineral leasing. No mineral exploration or development is expected to occur due to the lack of known economic discoveries.

Conclusions. There would be no impacts to mineral activities as none are projected to occur.

Adverse Impacts Which Cannot Be Avoided

On the 8,415 acres designated wilderness, the only unavoidable adverse impacts would be the loss of entry to minerals.

On the 1,011 acres designated nonwilderness, the unavoidable adverse impacts would be those associated with the loss of wilderness values from ORV use.

Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity.

On the 8,415 acres designated wilderness, the wilderness values would be protected, except in areas of valid discoveries.

On the 1,011 acres not designated wilderness, all present uses would continue. Motorized recreational use would reduce wilderness values.

Irreversible and Irretrievable Commitments of Resources

On the 8,415 acres designated wilderness, no irreversible or irretrievable commits of wilderness values is expected, except in areas of valid discoveries.

On the 1,011 acres designated nonwilderness there would be no irreversible commitment of wilderness resources.

All Wilderness Alternative

Under the All Wilderness Alternative, all 9,424 acres of public land in the Bad Lands WSA would be recommended suitable for wilderness designation.

The primary impacts under this alternative relate to the impacts of woodland product harvest, mineral withdrawal, and ORV closure in the designated wilderness and the resulting effects on recreational ORV use, and the protection of wilderness values.

Impacts on Wilderness Values

Under the All Wilderness Alternative all 9,424 acres of the Bad Lands WSA would be recommended suitable for wilderness designation and all wilderness values would be protected over the long-term by legislative mandate. Wilderness values of size, naturalness, opportunities for solitude, and the supplemental features of diversity of wildlife, and vistas would be retained in the majority of the WSA.

Wilderness designation would close the entire 9,424 acres of the Bad Lands WSA recreational ORV use. This action would eliminate approximately 150 visitor days of recreational ORV that are projected to occur annually in the area. This would improve the area's solitude and primitive and unconfined recreation. Wilderness values in the vicinity of cherrystem roads and boundary roads would be adversely impacted due to uncontrolled motorized use.

> Conclusion. Wilderness values would be retained on all 9,424 acres of the Bad Lands WSA, except along boundary roads where uncontrolled motorized access would adversely impact solitude. In the immediate vicinity of closed ways naturalness and solitude would be enhanced.

Impacts on Recreational Off-Road Vehicle Use

Wilderness designation would close the entire Bad Lands WSA to all forms of recreational ORV use. Recreational ORV use of approximately 150 visitor days would be eliminated annually from the WSA. Public land that offers similar opportunities for recreational ORV use is located throughout the region. Therefore, recreational ORV use forgone in the WSA would be absorbed on surrounding public lands.

Conclusion. Recreational ORV use of 50 visitor days would be foregone annually. The impacts of shifting this use to other public lands would be negligible.

Impacts on Development of Mineral resources

All lands within the Bad Lands WSA would be withdrawn from mineral entry and leasing. No exploration or development of any mineral resource would be precluded due to the absence of a known economic deposits.

Conclusion. There would be no impacts to mineral activities in the Bad Lands WSA.

No Wilderness Alternative

Under the proposed action, the entire 9,424 acres of the Bad Lands WSA would be recommended nonsuitable for wilderness designation.

The primary impacts under this alternative relate to recreational ORV use and the resulting impacts on wilderness values in the long term.

Impacts on Wilderness Values

The entire WSA would be open to mineral entry and leasing. All potential mineral resources would be available for exploration and development. It is not anticipated that any mineral activity would occur in the WSA.

ORV use is estimated to be about 50 visitor days annually and is expected to remain below 150 visitor days annually for the foreseeable future. Motorized use would continue on the ways throughout the WSA. Sights and sounds from recreational off-road vehicle use would have an adverse impact on solitude and primitive and unconfined recreation opportunities.

Conclusion. The Bad Lands WSA's wilderness values of naturalness, and outstanding opportunities for solitude would be reduced on the long-term.

Impacts on Recreational Off-Road Vehicle Use

The WSA would remain open to ORV use. Recreational ORV use is expected to increase to 150 visitor days annually for the foreseeable future.

Conclusion. There would be no impact on recreational ORV use.

Impacts on Development of Mineral Resources

All lands within the WSA would remain open for mineral entry and leasing. All potential mineral resources would be available for exploration and development. There are no mineral activities expected to occur in the WSA.

Conclusion. There would be no impact on mineral resources activities in the Bad Lands WSA.

CHAPTER 5

CONSULTATION, COORDINATION AND PUBLIC PARTICIPATION

CONSULTATION AND COORDINATION IN DEVELOPING THE ALTERNATIVES

Public involvement was a planned and integral part of the wilderness study in the Wells Resource Area.

Communication and consultation with all interested public land users and other concerned people have been important components in the Wells RMP/EIS process and they will continue to be important in the decision making and implementation processes. Public participation will continue through such means as comment periods, news releases, Coordinated Resource Management and Planning (CRMP), and informational meetings.

The planning issues and criteria were developed only after intensive input and review by the public. Initially, several public meetings were held in March and April of 1979 to identify issues of concern to individuals in the Wells RA. In addition, representatives of state and local governments, including the Elko Mayor and the Elko County Manager, and representatives of various user and interest groups (mining, livestock, environmental, and sportsmen) were contacted in November of 1979. This public input was combined with input from BLM staff specialists to identify and develop a set of planning issues.

A Federal Register notice of intent was published on May 23, 1980. This notice discussed issues to be considered in a general way and invited public comments and recommendations.

Planning criteria were developed to set standards and guidelines for the planning to follow. A draft version of the issues and planning criteria was distributed to the public in January 1981 in The Sage, a district newsletter. About 350 copies were sent to selected individuals, elected officials, interest groups, and other agencies. Another 4,000 copies were distributed as a supplement to the Elko Daily Free Press.

Fifty-seven responses were received. These included 33 individuals, four economic interest groups, two conservation groups, two "informal groups" (a family and an EIS consultant), and one university department spokesperson. A total of 38 respondents were residents of the Wells RA, while 12 were from the Reno-Carson City area and seven were from out of state.

The 57 public responses, along with comments received from the Nevada BLM State Office, were used to modify the planning issues and criteria with issues being restated as problem statements instead of general planning questions, and four issues being incorporated into other issues.

A second Federal Register notice was published on August 2, 1982. Its purpose was to present the revised issues noted above and the five alternatives to be analyzed in the EIS. This notice also initiated another 30-day public comment period.

Evening workshops in Reno, Elko, Wells and a week-long open house at the Elko District Office was held in September, 1982. Comments received were general in nature and pertained to how wilderness designation would affect other resources such as livestock grazing, woodland products, motorized recreational use and energy and minerals. Comments received have been utilized, along with impact analyses, in developing the Preferred Alternative.

The following items from the 1982 Nevada Statewide Comprehensive Outdoor Recreation Plan (SCORP) and the Elko County General Plan, which were identified during the wilderness study process, pertain to wilderness designation.

The 1982 SCORP states on page 4-17 that "The State of Nevada's position has not been supportive of wilderness area designation. In 1961 and 1975 the Legislature passed resolutions memorializing the U.S. Congress to continue full multiple use of federal lands for recreational and economic purposes. Subsequent state policy and administrative practices have been noncommittal toward wilderness."

The General Plan for Elko County (Smith 1971) recommends the "conscious preservation of open space. These essentially take the form of wilderness and scenic areas, drainage basins, and areas of historical or cultural significance. Most require a bare minimum of maintenance other than a policy prohibition of any development which would change their intrinsic character." This indicates a consistency with wilderness preservation.

INTERAGENCY CONTACTS

Professional contacts have been made with the Nevada Department of Wildlife, the U.S. Fish and Wildlife Service, and the U.S. Forest Service.

The Economics, Statistics, and Cooperatives Services (ESCS), U.S. Department of Agriculture, provided economic data for use in this EIS. These data were based on meetings with area ranchers and budget information gathered by the ESCS as part of a nation-wide study.

Agencies, organizations, and persons who were sent copies of the Draft RMP/EIS include those listed below.

Federal Agencies

- Department of the Interior
    - Bureau of Indian Affairs
    - Bureau of Land Management, District Offices in Idaho, Utah & Nevada
    - Bureau of Mines
    - Bureau of Reclamation
    - U.S. Fish and Wildlife Service
    - U.S. Geologic Survey
    - National Park Service
- Environmental Protection Agency
- Department of Agriculture
    - U.S. Forest Service
    - Soil Conservation Service

Department of Air Force
Department of Commerce
Department of Energy
Department of Transportation

State Agencies

Governor Richard Bryan
State Clearinghouse
(25 copies for distribution to State Agencies)

Local Agencies

Elko City Mayor
Elko County Commissioners
Elko County Manager
Elko County Planning Commission
Jackpot Advisory Council
Wells City Mayor
West Wendover Advisory Council

Indian Tribes

Te-Moak Bands of Western Shoshone

Universities

University of Nevada, Reno

Elected Officials

Senator Chic Hecht
Senator Paul Laxalt
Representative Harry Reid
Representative Barbara Vucanovich

Special Interest Groups and Others

American Fisheries Society
American Horse Protective Association
AMOCO Production Co.
Anaconda Copper
Atlantic Richfield
California Pacific Utilities
Chromalloy Corp.
Desert Fishes Council
Desert Research Institute
Elko County Assoc. of Conservation Districts
Elko County Sportsmen Association
Exxon Co.
Federal Land Bank Assoc.
Federation of Western Outdoor Clubs
Freeport Gold
Friends of the Earth

Special Interest Groups and Others
(continued)

International Society for the Protection of Mustangs & Burros
National Audobon Society
National Mustang Assoc.
National Resources Defense Council
National Rifle Association
National Wildlife Federation
Nevada Archeological Society
Nevada Cattlemen's Assoc.
Nevada Dept. Conservation & Natural Resources
Nevada Dept. of Wildlife
Nevada Farm Bureau Federation
Nevada Mining Association
Nevada Outdoor Recreation Association
Nevada Wildlife Federation
Nevada Woolgrowers' Assoc.
Northern Nevada Bass Association
Public Lands Council
Sierra Club
Sierra Pacific Power Co.
Soil Conservation Service
Southern Pacific Land Co.
The Wildlife Society
Union Oil Co.
Wells RA Livestock Operators
Western Pacific Railroad
WHOA Inc.
Wilderness Society
Wildlife Management Institute

Copies of this final environmental impact statement will be available for review at the following BLM offices and public libraries.

Bureau of Land Management Offices

Office of Public Affairs, BLM
18th and C Streets
Washington, D.C.

Nevada State Office
850 Harvard Way
Reno, Nevada

Battle Mountain District Office
N. 2nd and Scott Streets
Battle Mountain, Nevada

Battle Mountain District
Tonopah Resource Area Office
Building 102 Military Circle
Tonopah, Nevada

Bureau of Land Management Offices (continued)

Carson City District Office
1535 Hot Springs Road, Suite 300
Carson City, Nevada

Elko District Office
3900 E. Idaho Street
Elko, Nevada

Ely District Office
Star Route 5, Box 1
Ely, Nevada

Las Vegas District Office
4765 West Vegas Drive
Las Vegas, Nevada

Las Vegas District Office
Caliente Resource Area Office
Caliente, Nevada

Winnemucca District Office
705 East 4th Street
Winnemucca, Nevada

Public Libraries

Elko County Library
720 Court Street
Elko, Nevada

James R. Dickinson Library
Documents Department
University of Nevada at Las Vegas
4505 Maryland Parkway
Las Vegas, Nevada

Government Publications Department
University of Nevada, Reno Library
Reno, Nevada

Nevada State Library
Documents Department
Library Building
Carson City, Nevada

Wells Branch Library
Wells, Nevada

White Pine County Library
Courthouse Plaza
Ely, Nevada

PUBLIC REVIEW AND HEARINGS

Two public hearings were held during the public review period on the draft environmental impact statement. Oral statements pertaining to wilderness were presented by 11 people at the first hearing in Reno, Nevada on June 20, 1983 and by 6 people at the second and last hearing in Wells, Nevada on June 21, 1983.

Transcripts of the public hearings are available for inspection at both the BLM Nevada State Office and Elko district.

A total of 40 written comments were received during the public review period on the draft environmental impact statement.

All letters and testimony were reviewed to determine if they met the required criteria for response, i.e., discussion of the adequacy of the draft environmental impact statement. Substantive comments which presented new data, questioned facts and/or analyses, or commented on issues bearing directly on the draft environmental impact statement or the environmental impacts of the alternatives were fully evaluated and given responses. Changes or additions to the draft environmental impact statement have been incorporated into this final statement.

LIST OF PREPARERS

Steve Brooks, Geologist, BA, MA Geology, 8 years BLM

Diane Colcord, Cartography, B.S. Art Education, 20 years BLM

Bonnie Martiartu, Word Processor Operator, 5 years BLM

Norman Ritter, Forester, B.S. Forestry, 7 years BLM

David Squires, Team Leader, Outdoor Recreation Planner, B.S. Range and Wildlife Management, 8 years BLM

INDEX TO COMMENT LETTERS

All of the letters received during the public comment period which pertain to the wilderness issue have been reprinted in this final environmental impact statement. In addition, excerpts from the public hearings record which required responses have also been reprinted. The numbers which appear next to the individual's name correspond to the number assigned to be reprinted public comment. An asterisk next to a person's name indicates that both written and oral testimony was submitted. Responses were developed for the letters only, unless issues not covered in the letter were raised during oral testimony.

1. United States Department of Interior, Bureau of Indian Affairs, Eastern Nevada Agency

2. United States Department of the Interior, Fish and Wildlife Service, Great Basin Complex Office, Complex Manager, Donald J. King

3. United States Environmental Protection Agency, Region IX, Assistant Regional Administrator For Policy, Technical, and Management Resources, Charles W. Murray Jr.

4. Department of the Air Force, Deputy Regional Civil Engineer, W. Edward Fisher

5. State Office of Community Services, Governor's Consistency Review

6. Nevada State Clearinghouse

   Nevada Department of Wildlife, William A. Molini

7. Nevada Department of Agriculture, Executive Director, Thomas W. Ballow

8. Reed Secord

9. Harry Melts

10. Jeffrey Crook

11. Harry Melts (second letter from No. 7 above)

12. Bob Wright*

13. Atlantic Richfield Company, Public Lands Coordinator, J.R. Mitchell

14. Elliott Bernshaw

15. Blair G. Johns

16. Nevada Grazing Board, District No. 1, Chairman, Roy Young

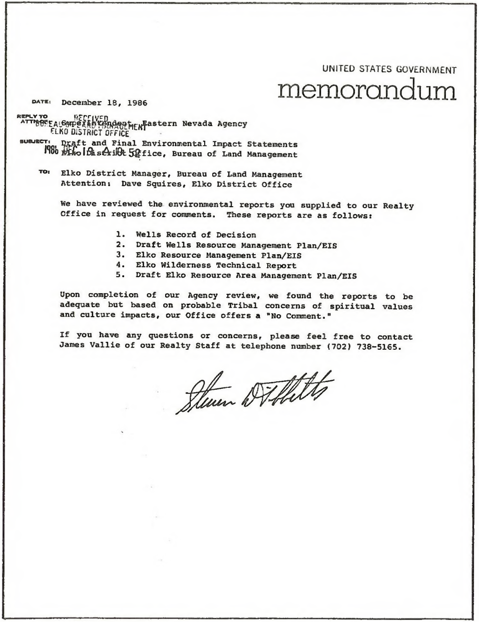
17. Ken Jones

18. Bob Wright (Second letter from No. 5 above)
19. The Wildlife Society, Nevada Chapter, President, William A. Molini
20. Leonard N. Wines
21. Von L. Sorensen
22. Blair G. Johns (second letter from No. 8 above)
23. Carol M. Johns
24. Eloise J. McQueary
25. Robert Hawks
26. Glenn E. Shewmaker*
27. Marla Griswald and Steve Boies*
28. Dick Roth*
29. Dick Roth* (second letter from No. 21 above)
30. Sierra Pacific Power Company, Manager, Environmental Affairs & Right-of-Way Acquisition, Michael P. Sullivan
31. Sierra Club, Toiyabe Chapter, Conservation Chair, Marjorie Sill
32. Sierra Club, Toiyabe Chapter, Public Lands Committee, Chair, Rose Strickland*
33. Nevada Cattlemen's Association, Executive Secretary, Paul Bottari
34. Jack G. Taylor
35. Kenneth L. Johns
36. Salmon River Cattlemen's Association, Secretary, Lloyd E. Shewmaker
37. Chromally, Manager Nevada Operations, Robert C. Walish, Environmental Liaison Nevada Operations, Sheila Miller
38. Demar H. Dahl*
39. Pleasant Valley Grazing Association, President, Bill Blake
40. Vargas & Bartlett Attorneys at Law, Linda A. Bowman

TESTIMONY

1. Texas Golf Minerals and Metals Company, District Geologist, Paul Hartley
2. Nevada Mining Association, Executive Secretary, Bob Warren
3. Dave Hornbeck
4. Nevada Grazing Board, District No. 1, Consultant, Les McKenzie
5. Von Sorensen
6. Marta Agee
7. Loyd Sorensen

Comment Letter 1



UNITED STATES GOVERNMENT
# memorandum

DATE: December 18, 1986

REPLY TO ATTN OF: Superintendent, Eastern Nevada Agency

RECEIVED
BUREAU OF LAND MANAGEMENT
ELKO DISTRICT OFFICE
1986 DEC 19 A 10:52

SUBJECT: Draft and Final Environmental Impact Statements
Elko District Office, Bureau of Land Management

TO: Elko District Manager, Bureau of Land Management
Attention: Dave Squires, Elko District Office

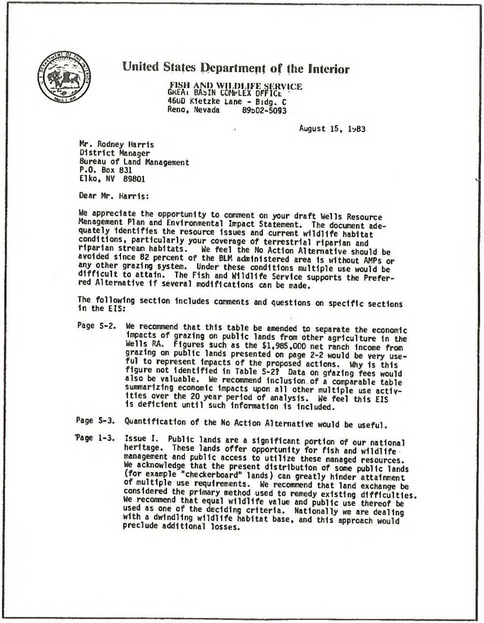
We have reviewed the environmental reports you supplied to our Realty Office in request for comments. These reports are as follows:

1. Wells Record of Decision
2. Draft Wells Resource Management Plan/EIS
3. Elko Resource Management Plan/EIS
4. Elko Wilderness Technical Report
5. Draft Elko Resource Area Management Plan/EIS

Upon completion of our Agency review, we found the reports to be adequate but based on probable Tribal concerns of spiritual values and culture impacts, our Office offers a "No Comment."

If you have any questions or concerns, please feel free to contact James Vallie of our Realty Staff at telephone number (702) 738-5165.

Comment Letter 2



United States Department of the Interior
FISH AND WILDLIFE SERVICE
GREAT BASIN COMPLEX OFFICE
4600 Kietzke Lane - Bldg. C
Reno, Nevada 89502-5093

August 15, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

Dear Mr. Harris:

We appreciate the opportunity to comment on your draft Wells Resource Management Plan and Environmental Impact Statement. The document adequately identifies the resource issues and current wildlife habitat conditions, particularly your coverage of terrestrial riparian and riparian stream habitats. We feel the No Action Alternative should be avoided since 82 percent of the BLM administered area is without AMPs or any other grazing system. Under these conditions multiple use would be difficult to attain. The Fish and Wildlife Service supports the Preferred Alternative if several modifications can be made.

The following section includes comments and questions on specific sections in the EIS:

Page S-2. We recommend that this table be amended to separate the economic impacts of grazing on public lands from other agriculture in the Wells RA. Figures such as the $1,985,000 net ranch income from grazing on public lands presented on page 2-2 would be very useful to represent impacts of the proposed actions. Why is this figure not identified in Table S-2? Data on grazing fees would also be valuable. We recommend inclusion of a comparable table summarizing economic impacts upon all other multiple use activities over the 20 year period of analysis. We feel this EIS is deficient until such information is included.

Page S-3. Quantification of the No Action Alternative would be useful.

Page 1-3. Issue I. Public lands are a significant portion of our national heritage. These lands offer opportunity for fish and wildlife management and public access to utilize these managed resources. We acknowledge that the present distribution of some public lands (for example "checkerboard" lands) can greatly hinder attainment of multiple use requirements. We recommend that land exchange be considered the primary method used to remedy existing difficulties. We recommend that equal wildlife value and public use thereof be used as one of the deciding criteria. Nationally we are dealing with a dwindling wildlife habitat base, and this approach would preclude additional losses.

Unique habitats and habitats supporting threatened or endangered species should not be considered in the above recommendation.

Page 1-4, Issue 3: We support an active program designed to secure legal access to public lands.

Page 1-7, Issue 8: We concur with the physical actions proposed in this section. However, to correct some poor wildlife habitat conditions, we recommend placing emphasis on planning criteria 1. e.g., mitigation of conflicts among wildlife and other multiple users, possibly through CRMP. However, this document should be very specific to assure the CRMP process works.

Page 1-8, Issue 8 and 9: Consideration should be given to federal responsibilities toward migratory birds in management of habitats covered in issues 8 and 9. Wetlands/riparian areas are well documented as critical for many migratory birds.

Page 1-8, Issue 9: We suggest a prioritized list of proven approaches be included here as is included under issue 6 above.

Page 2-2. The introductory paragraph under Management Alternatives discusses the moral and social aspect of grazing on public lands. We would like to see a similar adjacent paragraph discussing similar consideration involving fish and wildlife and their nonconsumptive and consumptive uses. The emotional value of these resources to consumers who expend monies and limited vacation time deserves recognition. The economics of these uses should also be developed. This should also include economics of business dependent upon these users (sporting goods, motels, restaurants, service stations, taxidermists, etc., etc).

Regardless of BLM's opinion as to the "impracticality" of a no grazing alternative because of impacts on ranchers, such an alternative deserves complete treatment in the draft HMP/EIS. In considering only wildlife values, all alternatives presented except the Resource Protection alternative are "impractical" because of impacts to wildlife, recreation, etc. A thorough and accurate presentation is needed of the economic gains realized through increased hunting, fishing, camping, boating, etc., if no grazing were allowed. A no-grazing alternative is routinely considered in HMPs and/or Grazing EIS; and we seriously question the validity of the Wells HMP/EIS unless such an alternative is presented and considered.

Page 2-22, Issue 1: The disposal of 93,150 acres primarily through sale would certainly preclude multiple use aspects. We recommend consideration of figures in the range of the Resource Protection Alternative. Also, we recommend that land exchange be the primary approach with wildlife habitat values and human use thereof being one of the deciding factors.

Page 2-11, 2-15, 2-20, 2-24. Issue 9. What is meant by "result in a minimum improvement of 30% of its condition within the short term"? We do not understand how habitat can be improved some "percentage of its condition", if condition refers to poor, fair, good, or excellent. Is the BLM stating that it will improve 30% of the indicated riparian habitat (e.g., 26.2 miles) a minimum of one condition class?

Page 3-12. Threatened, Endangered, and Sensitive Species. No mention is made of the Mary's River Aquatic Habitat Management Plan (Mary's River HMP) and its management implication for Lahontan Cutthroat trout. This is crucial because the Lahontan Cutthroat Trout Fishery Management Plan for the Humboldt River Drainage Basin specifies that agency (e.g., BLM) land management planning processes (e.g., HMPs) will be the mechanism for management of riparian and stream habitats. This plan has been approved and signed by the Director of the Nevada Department of Wildlife and is being reviewed for signature by the Regional Director, U.S. Fish and Wildlife Service; Regional Forester, U.S. Forest Service; and State Director, Bureau of Land Management. Once signed, this management plan commits each of the agencies to implement the management actions specified in the plan. Delisting of the Lahontan Cutthroat trout in the Humboldt River Basin would then be initiated by the U.S. Fish and Wildlife Service. It is important for the BLM to realize that the Humboldt River Drainage Basin management plan for Lahontan Cutthroat trout is one component of the Lahontan Cutthroat Trout Recovery Plan, as required under Section 4 of the Endangered Species Act. Approval of the Humboldt River plan by the four agencies involved is a major commitment of those agencies to undertake specific management actions so that delisting of the Lahontan Cutthroat trout may be initiated. Failure of the Wells RMP to satisfy these proposed actions would violate the intent and purpose of the Endangered Species Act. In this context, BLM should be aware of the following objectives stated in the Humboldt River Drainage Lahontan Cutthroat Trout Management Plan:

1) Stream riparian quality will not be allowed to decline below present condition class levels.

2) One-third of the stream riparian and habitat conditions will be improved one condition class within the first 10 year period.

3) Land management plans within the Lahontan Cutthroat trout planning areas will receive funding priorities for program implementation when funds are available.

Furthermore, the Humboldt River Drainage plan specifies the following management priorities in the Mary's River subbasin:

1) Riparian habitat and stream quality improvement through HMP and AMP planning

2) Completion of fish population surveys

3) Instream improvements in Mary's River through boulder placement

4) Completion of the stream survey on south end.

BLM should therefore insure that management plans for riparian and stream habitats meet criteria specified in the Humboldt River Fishery Management Plan.

In the context of the #1 and #2 objectives for the entire Humboldt River Basin, none of the alternatives appear to meet this objective. As pointed out previously, wording of management actions under Issue 9 in each Alternative is confusing and we suggest they be rewritten.

Page 2-24, Issue 8: Under Short and Long-Term Management Actions, No. 2, we recommend that you implement adjustments in livestock seasons and numbers as necessary to support multiple use objectives, including wildlife on all habitats.

Page 2-24, Issue 9: It is recommended that the entire 161 miles (p. 3-12) of Riparian/Stream Habitat in less than good condition receive upgrading to good condition within the 20 year long-term Management Action. Again, the Humboldt River Basin Lahontan Cutthroat Trout Management Plan specifies that one-third of riparian habitats will be improved one condition class in the first 10 years.

Page 2-31. Standard Operating Procedures. FWS supports the listed procedures and recommends their continued implementation in BLM actions.

Page 3-9 Threatened, Endangered, and Sensitive Species. Does the BLM have management plans proposed for the known roosting areas for Bald Eagles? Are there any proposed plans for possible reintroduction (with NDDW assistance) of peregrine falcons into known historic habitat (Salt Lake ACEC)? Four bird species (Ferruginous hawk, Swainson's hawk, Long-billed curlew, and White-faced ibis) are considered candidate species by FWS. Information indicates that these species warrant consideration under the Endangered Species Act, pending additional data. FWS would like to see effects of possible alternative actions on these species addressed in the RMP/EIS. Consideration of these actions on candidate species may help to insure that future listing of those species will not be necessary.

Page 3-12 Redband trout and Relict dace are both candidate species for listing under the Endangered Species Act. Does the BLM have any management plans for these two species? As with above-mentioned birds, present consideration of these species and their habitats may help prevent future listing.

Page A5-9 Reliance on only 35 "key members of the local economy" for interviews to determine information on social values and public attitudes is highly questionable in our opinion. Were an equal number of hunting/fishing/wilderness/camping/etc. representatives included along with ranching/mining/banking/development, etc. interests?

Page A5-10 On Table A5-3 we question the omission of user days for upland game and waterfowl. Since this EIS covers a 20-year period, average conditions should serve as a guide. We believe that the Resource Protection and other alternatives should produce substantial gains in these areas over the 20-year period of analysis. We recommend the inclusion of user days in these areas. Is this table representative over the 20-year period of analysis?

Please explain the 175 user days identified for deer under the Resource Protection analysis.

Please explain how the Resource Protection alternative will support 2,000 less days of camping than the Resource Production alternative.

Are the basic figures for hunting and fishing consistent with Nevada Department of Wildlife figures and projections for these activities?

Page A5-11 Table A5-4. Is the listed source correct for derivation of this table? BLM 1982b, according to References, is an unpublished report on range condition and trends. Where were the data for Table A-5-4 derived? How does Table A5-4 relate to the user days presented in Table A5-3 in terms of a dollar value for each type of user day, and an average value for all types combined.

Page A5-11 Is Table A5-4 a complete analysis of expenditures generated through activities identified in Table A5-3? A large proportion of such expenditures frequently occur beyond the immediate area of analysis and are normally considered essential for a thorough analysis.

Does Table A5-4 include consideration of intangible values to the identified users?

Does Table A5-4 represent the 20-year period of analysis?

We recommend creation of another table which may be used in conjunction with Summary Table S-2 on page S-4.

If you have any questions concerning these comments, additional input can be provided in an effort to adequately address the wildlife values of the Wells Resource Area.

Sincerely,

Donald J. King

Donald J. King
Complex Manager

Comment Letter 3

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

AUG 18 1983

Rodney Harris
District Manager
Elko BLM District Office
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) titled WELLS RESOURCE MANAGEMENT PLAN, ELKO COUNTY, NEVADA. We have the enclosed comments regarding this DEIS.

We have classified this DEIS as Category LO-2. Definitions of the categories are provided by the enclosure. The classification and date of EPA's comments will be published in the *Federal Register* in accordance with our public disclosure responsibilities under Section 309 of the Clean Air Act.

We appreciate the opportunity to review this DEIS. Please send three copies of the Final Environmental Impact Statement (FEIS) to this office at the same time it is officially filed with our Washington, D.C. office. If you have any questions, please contact Loretta Kahn Barsamian, Chief, EIS Review Section, at (415) 974-8188 or FTS 454-8188.

Sincerely yours,

Charles W. Murray, Jr.

Charles W. Murray, Jr.
Assistant Regional Administrator
for Policy, Technical and
Resources Management

Enclosures (2)

Comment Letter 3

Water Quality Comments

1. The DEIS provides very little specific water quality data for the area. On page 3-32, the DEIS states:

> Surface water quality varies within the Wells RA. From 1979 through 1982, BLM conducted a water quality survey which included sampling 39 streams and 15 springs during the high water flow, high temperature and low water flow periods. The results of the survey indicate that surface water quality is adequate for livestock watering and irrigation purposes. The suitability of surface water for domestic uses depends upon the location of the source.

This is not an adequate response to our scoping comments of October 22, 1982.

The FEIS should elaborate upon this information by comparing the water quality survey results with the state-adopted, Federally-approved water quality standards for the area. The Nevada Division of Environmental Protection should be contacted regarding the appropriate standards. Also, the FEIS should discuss any likely future changes to the water quality resulting from the preferred alternative and provide mitigation measures.

Air Quality Comments

1. The DEIS states (pp. 4-1, 4-2), "Impacts to air quality and groundwater are not considered to be significant and will not be discussed further."

The FEIS should substantiate that statement, especially with regard to mining activities.

General Comments

1. The FEIS should clarify what interim management measures will be in effect during the wilderness classification process.

1 The DEIS states that no controls on off-road vehicles will be in effect prior to wilderness classification. (p. 4-3). The FEIS should clarify whether this will affect the potential wilderness status of these areas.

2 The FEIS should clarify whether access for mining, oil and gas exploration, or other development will be allowed during the wilderness designation process.

3 2. The DEIS notes on page 4-3 that a minerals survey by U.S. Geological Survey/Bureau of Mines will be done. The RMP FEIS and the subsequent wilderness EISs should discuss how this information will be used to modify the 159,881 acres identified as suitable for wilderness designation.

3. Please send our Regional Office a copy of the Wells RA Wilderness Technical Report to facilitate our review of the final EISs.

4. The DEIS recommends no further study of the Mary's River for possible inclusion in the National Wild and Scenic River System.

Specifically the DEIS states on page 4-2 that:

> About 25 miles of the Mary's River are on this list and were analyzed by the Elko BLM and the Humboldt National Forest in a report titled Mary's River - Wild and Scenic River Evaluation dated December 1982. This report determined that implementation of the Mary's River Habitat Management Plan involving stream rehabilitation and the presence of 14 of the 25 river miles within the Jarbidga Wilderness Area would provide more protection and enhancement of the stream and its environs than would further study for inclusion into the National Wild and Scenic River System. Therefore, further study of the river would not have a significant beneficial or adverse impact and will not be analyzed further.

The FEIS should clarify why further Wild and Scenic study could not take place in addition to the River Habitat Management Plan.

Vegetation Comments

1. The DEIS does not present adequate information regarding how the proposed grazing levels under the RMP will impact the ecological range conditions.

The existing ecological range conditions are estimated in Table A2-2 (p. A2-6). That table shows the conditions as: excellent - 1%; good - 25%; fair - 54%; and poor - 20%.

The FEIS should include an additional map showing the distribution of these areas within each Resource Conflict Area.

There is apparantly not enough information available at this time to determine ecological range conditions and trends (p. 3-25). In the absence of such important information, the FEIS should provide a "worst case" analysis of possible vegetation impacts resulting from each of the alternatives.

Comment Letter 3

EIS CATEGORY CODES

Environmental Impact of the Action

LO—Lack of Objections

EPA has no objection to the proposed action as described in the draft impact statement; or suggests only minor changes in the proposed action.

ER—Environmental Reservations

EPA has reservations concerning the environmental effects of certain aspects of the proposed action. EPA believes that further study of suggested alternatives or modifications is required and has asked the originating Federal agency to reassess these aspects.

EU—Environmentally Unsatisfactory

EPA believes that the proposed action is unsatisfactory because of its potentially harmful effect on the environment. Furthermore, the Agency believes that the potential safeguards which might be utilized may not adequately protect the environment from hazards arising from this action. The Agency recommends that alternatives to the action be analyzed further (including the possibility of no action at all).

Adequacy of the Impact Statement

Category 1—Adequate

The draft impact statement adequately sets forth the environmental impact of the proposed project or action as well as alternatives reasonably available to the project or action.

Category 2—Insufficient Information

EPA believes that the draft impact statement does not contain sufficient information to assess fully the environmental impact of the proposed project or action. However, from the information submitted, the Agency is able to make a preliminary determination of the impact on the environment. EPA has requested that the originator provide the information that was not included in the draft statement.

Category 3—Inadequate

EPA believes that the draft impact statement does not adequately assess the environmental impact of the proposed project or action, or that the statement inadequately analyzes reasonably available alternatives. The Agency has requested more information and analysis concerning the potential environmental hazards and has asked that substantial revision be made to the impact statement.

If a draft impact statement is assigned a Category 3, no rating will be made of the project or action, since a basis does not generally exist on which to make such a determination.

Response Letter 3

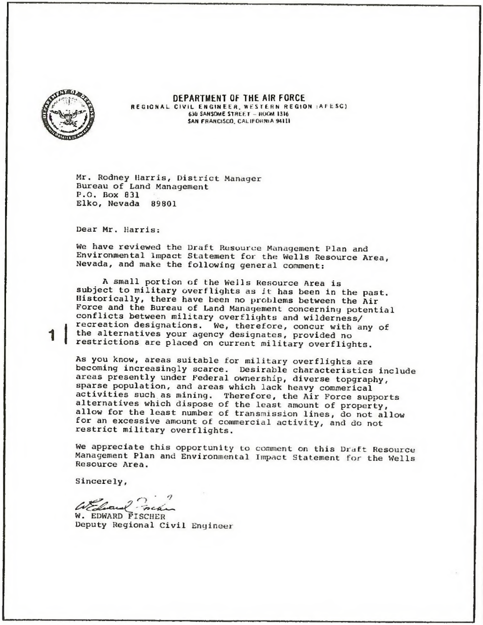
RESPONSE

1 The DEIS stated that the WSAs will be designated as open to off-road vehicle (ORV) use until wilderness designations are enacted by Congress. BLM is directed to control ORV use if impacts threaten to impair wilderness suitability. Currently, there are no impairing impacts from ORV use occurring in the WSAs.

2 Access for mining, oil and gas exploration or other development may be allowed in WSAs subject to certain guidelines where are described in the BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review.

3 If the joint USGS/BLM report identifies additional mineral resources which are significant and which outweigh wilderness values, then a supplemental EIS will be prepared.

Comment Letter 4



DEPARTMENT OF THE AIR FORCE
REGIONAL CIVIL ENGINEER, WESTERN REGION (AFESC)
630 SANSOME STREET – ROOM 1316
SAN FRANCISCO, CALIFORNIA 94111

Mr. Rodney Harris, District Manager
Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

We have reviewed the Draft Resource Management Plan and Environmental Impact Statement for the Wells Resource Area, Nevada, and make the following general comment:

A small portion of the Wells Resource Area is
subject to military overflights as it has been in the past.
Historically, there have been no problems between the Air
Force and the Bureau of Land Management concerning potential
conflicts between military overflights and wilderness/
recreation designations. We, therefore, concur with any of
1 the alternatives your agency designates, provided no
restrictions are placed on current military overflights.

As you know, areas suitable for military overflights are becoming increasingly scarce. Desirable characteristics include areas presently under Federal ownership, diverse topgraphy, sparse population, and areas which lack heavy commerical activities such as mining. Therefore, the Air Force supports alternatives which dispose of the least amount of property, allow for the least number of transmission lines, do not allow for an excessive amount of commercial activity, and do not restrict military overflights.

We appreciate this opportunity to comment on this Draft Resource Management Plan and Environmental Impact Statement for the Wells Resource Area.

Sincerely,

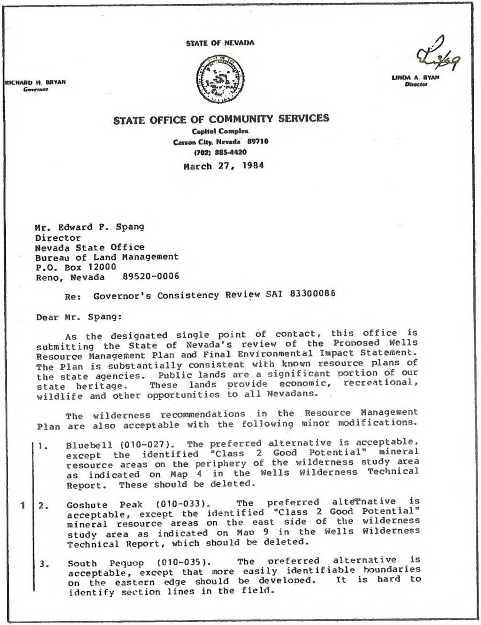
W. EDWARD FISCHER
Deputy Regional Civil Engineer

Response Letter 4

RESPONSE

1 Refer to Chapter 1, under the issues considered but dropped section.

Comment Letter 5



STATE OF NEVADA

RICHARD H. BRYAN
Governor

LINDA A. RYAN
Director

STATE OFFICE OF COMMUNITY SERVICES
Capitol Complex
Carson City, Nevada 89710
(702) 885-4420

March 27, 1984

Mr. Edward F. Spang
Director
Nevada State Office
Bureau of Land Management
P.O. Box 12000
Reno, Nevada 89520-0006

Re: Governor's Consistency Review SAI 83300086

Dear Mr. Spang:

As the designated single point of contact, this office is submitting the State of Nevada's review of the Proposed Wells Resource Management Plan and Final Environmental Impact Statement. The Plan is substantially consistent with known resource plans of the state agencies. Public lands are a significant portion of our state heritage. These lands provide economic, recreational, wildlife and other opportunities to all Nevadans.

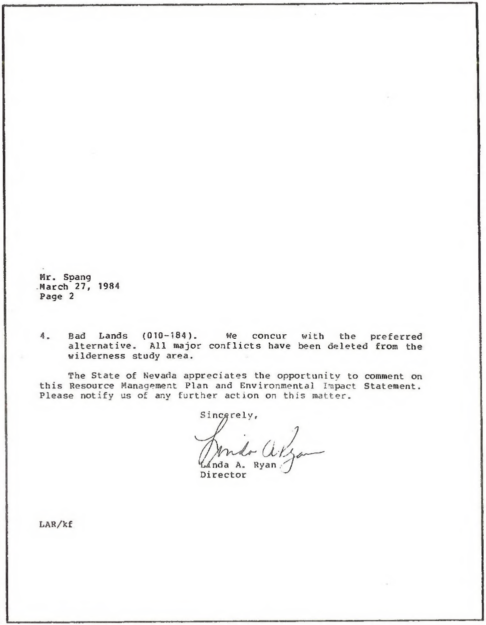
The wilderness recommendations in the Resource Management Plan are also acceptable with the following minor modifications.

1. Bluebell (010-027). The preferred alternative is acceptable, except the identified "Class 2 Good Potential" mineral resource areas on the periphery of the wilderness study area as indicated on Map 4 in the Wells Wilderness Technical Report. These should be deleted.

1 2. Goshute Peak (010-033). The preferred alternative is acceptable, except the identified "Class 2 Good Potential" mineral resource areas on the east side of the wilderness study area as indicated on Map 9 in the Wells Wilderness Technical Report, which should be deleted.

3. South Pequop (010-035). The preferred alternative is acceptable, except that more easily identifiable boundaries on the eastern edge should be developed. It is hard to identify section lines in the field.

Comment Letter 5



Mr. Spang
March 27, 1984
Page 2

4. Bad Lands (010-184). We concur with the preferred alternative. All major conflicts have been deleted from the wilderness study area.

The State of Nevada appreciates the opportunity to comment on this Resource Management Plan and Environmental Impact Statement. Please notify us of any further action on this matter.

Sincerely,

Linda A. Ryan

Linda A. Ryan
Director

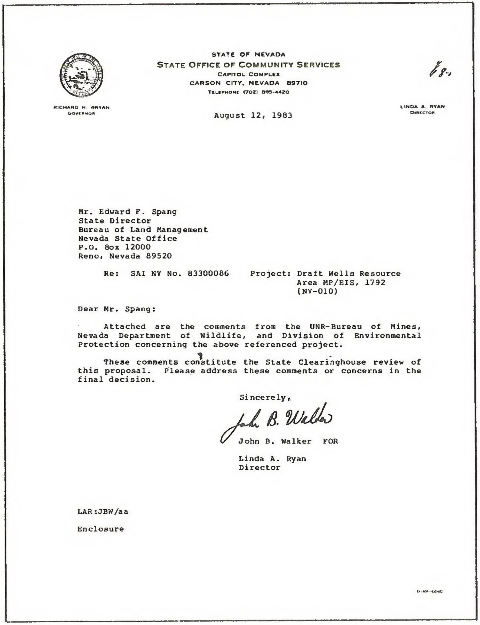
LAR/kf

Response Letter 5

Response to Letter 5

1. The Proposed Action for each of these WSAs was changed based on these comments. Refer to page 10 of this document and the Alternatives maps at the end of Chapter 2.

Comment Letter 6



STATE OF NEVADA
STATE OFFICE OF COMMUNITY SERVICES
CAPITOL COMPLEX
CARSON CITY, NEVADA 89710
TELEPHONE (702) 885-4420

RICHARD H. BRYAN
GOVERNOR

LINDA A. RYAN
DIRECTOR

l8-1

August 12, 1983

Mr. Edward F. Spang
State Director
Bureau of Land Management
Nevada State Office
P.O. Box 12000
Reno, Nevada 89520

Re: SAI NV No. 83300086 Project: Draft Wells Resource Area MP/EIS, 1792 (NV-010)

Dear Mr. Spang:

Attached are the comments from the UNR-Bureau of Mines, Nevada Department of Wildlife, and Division of Environmental Protection concerning the above referenced project.

These comments constitute the State Clearinghouse review of this proposal. Please address these comments or concerns in the final decision.

Sincerely,

John B. Walker

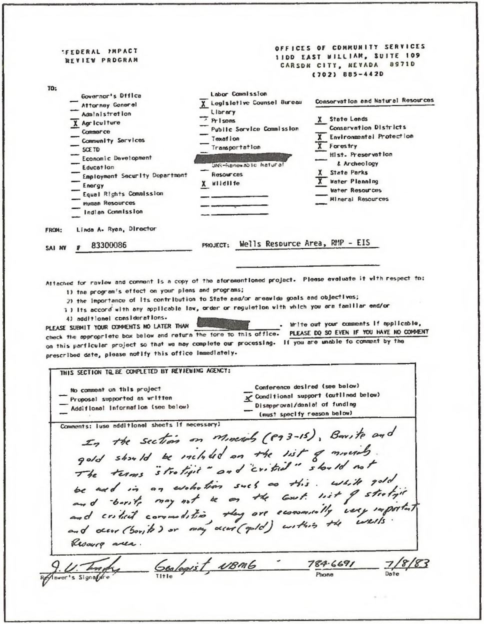
John B. Walker FOR

Linda A. Ryan
Director

LAR:JBW/aa

Enclosure

Comment Letter 6



FEDERAL IMPACT
REVIEW PROGRAM

OFFICES OF COMMUNITY SERVICES
1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

TO:

☐ Governor's Office
☐ Attorney General
☐ Administration
☒ Agriculture
☐ Commerce
☐ Community Services
☐ SCETD
☐ Economic Development
☐ Education
☐ Employment Security Department
☐ Energy
☐ Equal Rights Commission
☐ Human Resources
☐ Indian Commission

☐ Labor Commission
☒ Legislative Counsel Bureau
☐ Library
☐ Prisons
☐ Public Service Commission
☐ Taxation
☐ Transportation
[redacted]
☐ UNR-Renewable Natural Resources
☒ Wildlife
☐ ____
☐ ____
☐ ____

Conservation and Natural Resources

☒ State Lands
☐ Conservation Districts
☒ Environmental Protection
☒ Forestry
☐ Hist. Preservation & Archeology
☒ State Parks
☒ Water Planning
☐ Water Resources
☐ Mineral Resources

FROM: Linda A. Ryan, Director

SAI NV # 83300086

PROJECT: Wells Resource Area, RMP - EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
4) additional considerations.

PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [redacted]. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the prescribed date, please notify this office immediately.

THIS SECTION TO BE COMPLETED BY REVIEWING AGENCY:

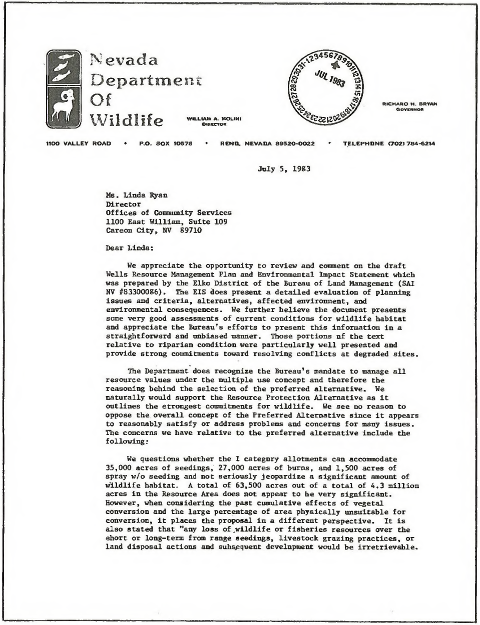
☐ No comment on this project
☐ Proposal supported as written
☐ Additional information (see below)
☐ Conference desired (see below)
☒ Conditional support (outlined below)
☐ Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

In the section on Minerals (P93-15), Barite and gold should be included on the list of minerals. The terms "strategic" and "critical" should not be used in an evaluation such as this. While gold and barite may not be on the Govt. list of strategic and critical commodities, they are economically very important and occur (barite) or may occur (gold) within the Wells Resource area.

Reviewer's Signature: J. V. Tingley
Title: Geologist, NBMG
Phone: 784-6691
Date: 7/8/83

Comment Letter 6



Nevada
Department
Of
Wildlife

WILLIAM A. MOLINI
DIRECTOR

RICHARD H. BRYAN
GOVERNOR

1100 VALLEY ROAD • P.O. BOX 10678 • RENO, NEVADA 89520-0022 • TELEPHONE (702) 784-6214

JUL 1983

July 5, 1983

Ms. Linda Ryan
Director
Offices of Community Services
1100 East William, Suite 109
Carson City, NV 89710

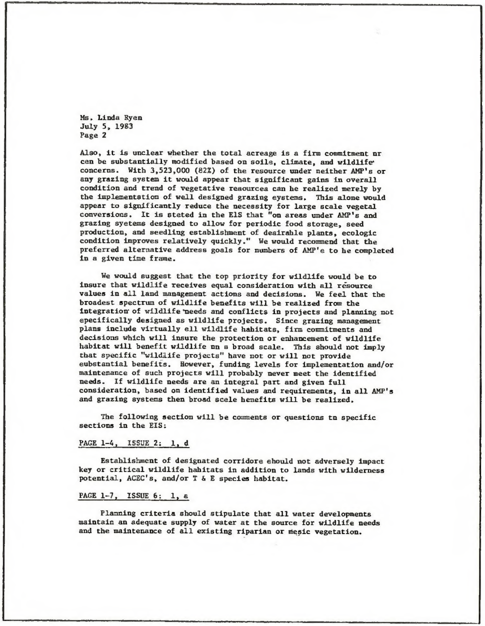
Dear Linda:

We appreciate the opportunity to review and comment on the draft Wells Resource Management Plan and Environmental Impact Statement which was prepared by the Elko District of the Bureau of Land Management (SAI NV #83300086). The EIS does present a detailed evaluation of planning issues and criteria, alternatives, affected environment, and environmental consequences. We further believe the document presents some very good assessments of current conditions for wildlife habitat and appreciate the Bureau's efforts to present this information in a straightforward and unbiased manner. Those portions of the text relative to riparian condition were particularly well presented and provide strong commitments toward resolving conflicts at degraded sites.

The Department does recognize the Bureau's mandate to manage all resource values under the multiple use concept and therefore the reasoning behind the selection of the preferred alternative. We naturally would support the Resource Protection Alternative as it outlines the strongest commitments for wildlife. We see no reason to oppose the overall concept of the Preferred Alternative since it appears to reasonably satisfy or address problems and concerns for many issues. The concerns we have relative to the preferred alternative include the following:

We questions whether the I category allotments can accommodate 35,000 acres of seedings, 27,000 acres of burns, and 1,500 acres of spray w/o seeding and not seriously jeopardize a significant amount of wildlife habitat. A total of 63,500 acres out of a total of 4.3 million acres in the Resource Area does not appear to be very significant. However, when considering the past cumulative effects of vegetal conversion and the large percentage of area physically unsuitable for conversion, it places the proposal in a different perspective. It is also stated that "any loss of wildlife or fisheries resources over the short or long-term from range seedings, livestock grazing practices, or land disposal actions and subsequent development would be irretrievable.

Comment Letter 6



Ms. Linda Ryan
July 5, 1983
Page 2

Also, it is unclear whether the total acreage is a firm commitment or can be substantially modified based on soils, climate, and wildlife concerns. With 3,523,000 (82%) of the resource under neither AMP's or any grazing system it would appear that significant gains in overall condition and trend of vegetative resources can be realized merely by the implementation of well designed grazing systems. This alone would appear to significantly reduce the necessity for large scale vegetal conversions. It is stated in the EIS that "on areas under AMP's and grazing systems designed to allow for periodic food storage, seed production, and seedling establishment of desirable plants, ecologic condition improves relatively quickly." We would recommend that the preferred alternative address goals for numbers of AMP's to be completed in a given time frame.

We would suggest that the top priority for wildlife would be to insure that wildlife receives equal consideration with all resource values in all land management actions and decisions. We feel that the broadest spectrum of wildlife benefits will be realized from the integration of wildlife needs and conflicts in projects and planning not specifically designed as wildlife projects. Since grazing management plans include virtually all wildlife habitats, firm commitments and decisions which will insure the protection or enhancement of wildlife habitat will benefit wildlife on a broad scale. This should not imply that specific "wildlife projects" have not or will not provide substantial benefits. However, funding levels for implementation and/or maintenance of such projects will probably never meet the identified needs. If wildlife needs are an integral part and given full consideration, based on identified values and requirements, in all AMP's and grazing systems then broad scale benefits will be realized.

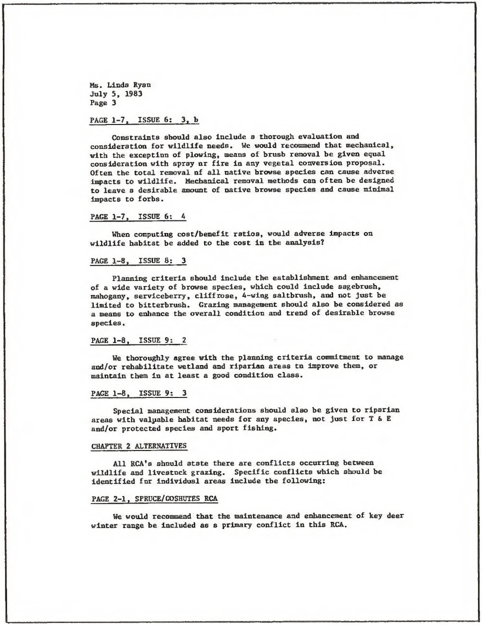
The following section will be comments or questions to specific sections in the EIS:

PAGE 1-4, ISSUE 2: 1, d

Establishment of designated corridors should not adversely impact key or critical wildlife habitats in addition to lands with wilderness potential, ACEC's, and/or T & E species habitat.

PAGE 1-7, ISSUE 6: 1, a

Planning criteria should stipulate that all water developments maintain an adequate supply of water at the source for wildlife needs and the maintenance of all existing riparian or mesic vegetation.



Ms. Linda Ryan
July 5, 1983
Page 3

PAGE 1-7, ISSUE 6: 3, b

Constraints should also include a thorough evaluation and consideration for wildlife needs. We would recommend that mechanical, with the exception of plowing, means of brush removal be given equal consideration with spray or fire in any vegetal conversion proposal. Often the total removal of all native browse species can cause adverse impacts to wildlife. Mechanical removal methods can often be designed to leave a desirable amount of native browse species and cause minimal impacts to forbs.

PAGE 1-7, ISSUE 6: 4

When computing cost/benefit ratios, would adverse impacts on wildlife habitat be added to the cost in the analysis?

PAGE 1-8, ISSUE 8: 3

Planning criteria should include the establishment and enhancement of a wide variety of browse species, which could include sagebrush, mahogany, serviceberry, cliffrose, 4-wing saltbrush, and not just be limited to bitterbrush. Grazing management should also be considered as a means to enhance the overall condition and trend of desirable browse species.

PAGE 1-8, ISSUE 9: 2

We thoroughly agree with the planning criteria commitment to manage and/or rehabilitate wetland and riparian areas to improve them, or maintain them in at least a good condition class.

PAGE 1-8, ISSUE 9: 3

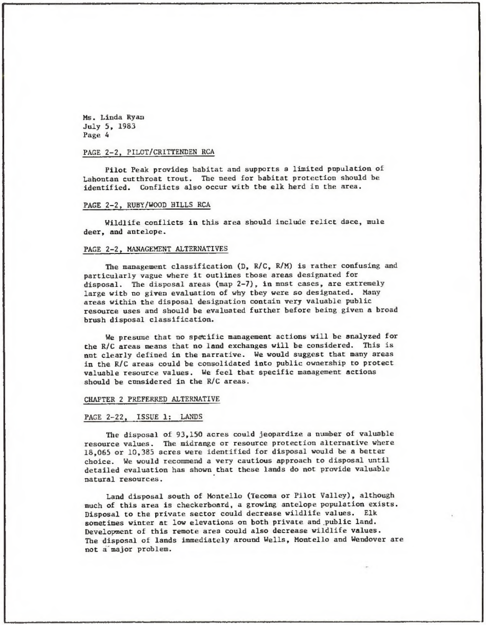
Special management considerations should also be given to riparian areas with valuable habitat needs for any species, not just for T & E and/or protected species and sport fishing.

CHAPTER 2 ALTERNATIVES

All RCA's should state there are conflicts occurring between wildlife and livestock grazing. Specific conflicts which should be identified for individual areas include the following:

PAGE 2-1, SPRUCE/GOSHUTES RCA

We would recommend that the maintenance and enhancement of key deer winter range be included as a primary conflict in this RCA.



Ms. Linda Ryan
July 5, 1983
Page 4

PAGE 2-2, PILOT/CRITTENDEN RCA

Pilot Peak provides habitat and supports a limited population of Lahontan cutthroat trout. The need for habitat protection should be identified. Conflicts also occur with the elk herd in the area.

PAGE 2-2, RUBY/WOOD HILLS RCA

Wildlife conflicts in this area should include relict dace, mule deer, and antelope.

PAGE 2-2, MANAGEMENT ALTERNATIVES

The management classification (D, R/C, R/M) is rather confusing and particularly vague where it outlines those areas designated for disposal. The disposal areas (map 2-7), in most cases, are extremely large with no given evaluation of why they were so designated. Many areas within the disposal designation contain very valuable public resource uses and should be evaluated further before being given a broad brush disposal classification.

We presume that no specific management actions will be analyzed for the R/C areas means that no land exchanges will be considered. This is not clearly defined in the narrative. We would suggest that many areas in the R/C areas could be consolidated into public ownership to protect valuable resource values. We feel that specific management actions should be considered in the R/C areas.

CHAPTER 2 PREFERRED ALTERNATIVE

PAGE 2-22, ISSUE 1: LANDS

The disposal of 93,150 acres could jeopardize a number of valuable resource values. The midrange or resource protection alternative where 18,065 or 10,385 acres were identified for disposal would be a better choice. We would recommend a very cautious approach to disposal until detailed evaluation has shown that these lands do not provide valuable natural resources.

Land disposal south of Montello (Tecoma or Pilot Valley), although much of this area is checkerboard, a growing antelope population exists. Disposal to the private sector could decrease wildlife values. Elk sometimes winter at low elevations on both private and public land. Development of this remote area could also decrease wildlife values. The disposal of lands immediately around Wells, Montello and Wendover are not a major problem.

Ms. Linda Ryan
July 5, 1983
Page 5

PAGE 2-23, ISSUE 5: WILDERNESS

We would favor the identified wilderness in the preferred alternative as being preliminarily suitable for wilderness designation.

PAGE 2-23, ISSUE 6: LIVESTOCK GRAZING, 3

We wholly support the development of AMP's and grazing systems on allotments. We would hope that such systems would be implemented for all category allotments.

PAGE 2-24, ISSUE 8: TERRESTRIAL WILDLIFE HABITAT

Livestock adjustments should be implemented, not just considered, to improve or maintain essential or crucial wildlife habitats. Also numbers, not just season of use, may have to be adjusted. It would be desirable to set a specific level at which these habitats would be maintained at or improved to. We would suggest that the level be set at least at good or better condition.

What is the definition of essential habitat? Our definition of essential would cover a very broad range of habitat needs for all wildlife species.

We would suggest that the improvement of 5,000 acres of crucial big game habitat be accomplished by a variety of management methods, not just by chain or burn. In some areas a very restrictive livestock grazing system may accomplish identified goals.

A high priority management action for wildlife should include the complete integration of wildlife needs into any grazing system.

PAGE 2-24, ISSUE 8: 5

Chain or burn and seed 5,500 acres to improve crucial big game habitat should be considered carefully. Vegetative manipulation on winter ranges is a risky proposition at best. Seeding browse would be beneficial, but livestock removal is a must until "ID" team agrees that plant phenology could handle livestock use.

PAGE 2-25, ISSUE 10: WOODLAND PRODUCTS, 4

The recommendation to harvest 75 percent canopy cover removal of woodland products on 50,000 acres of crucial deer winter habitat should be site specific. Thermal cover is essential for winter survival of mule deer.

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Page 6

PAGE 2-25, ISSUE 10: 6

To successfully rejuvenate deteriorated aspen stands will require some long-term management commitments, such as elimination of grazing for a period of years till sprouts are established. Merely burning and cutting in itself will not be successful. We also seriously question whether there is sufficient aspen in the Resource Area to even support any level of harvest program.

Proper use levels for livestock should be established for key browse species on all key or critical big game winter ranges. Proper livestock utilization on these species will assure that ample forage remains for big game.

PAGE 2-30 MONITORING

We would consider 45% utilization of shrubs by livestock on key winter ranges to be excessive. The utilization level should be held to 25-30% or less in these areas.

PAGE 2-32

The incorporation of the Western State's Sage Grouse Guidelines into the Standard Operating Procedures is a very positive accomplishment. We also view Standard Operating Procedures numbers 22 through 30 as having positive aspects for wildlife.

CHAPTER 3 AFFECTED ENVIRONMENT

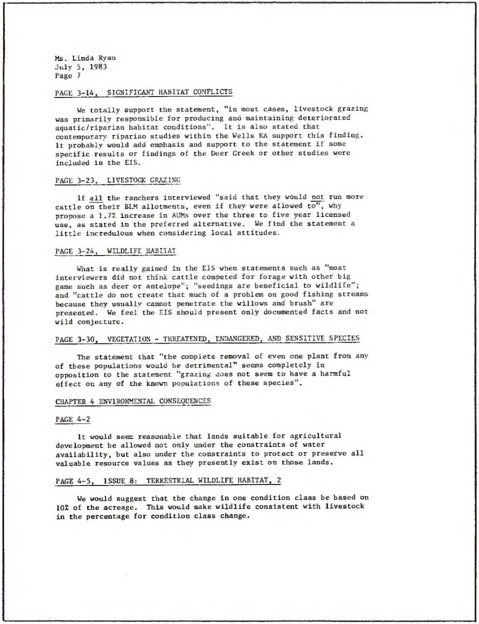
PAGE 3-9, BIG GAME POPULATIONS AND HABITAT CONDITIONS

Maps 3-5 and 3-6 should be updated from additional information which is available at our Elko office. We are particularly concerned that the potential reintroduction sites for antelope and bighorn sheep are not adequately identified on these maps.

PAGE 3-11, HABITAT CONFLICTS

It should also be identified that conflicts with livestock and riparian areas include the excessive removal of mesic vegetation associated with the site. Long term excessive use will result in elimination of desirable mesic species and/or invasion by less desirable species. Excessive removal of mesic vegetation can also initiate or accelerate erosion.

There are numerous habitat conflicts not associated with terrestrial or stream riparian sites throughout the RA. These conflicts should be discussed in the narrative.



Ms. Linda Ryan
July 5, 1983
Page 7

PAGE 3-14, SIGNIFICANT HABITAT CONFLICTS

We totally support the statement, "in most cases, livestock grazing was primarily responsible for producing and maintaining deteriorated aquatic/riparian habitat conditions". It is also stated that contemporary riparian studies within the Wells RA support this finding. It probably would add emphasis and support to the statement if some specific results or findings of the Deer Creek or other studies were included in the EIS.

PAGE 3-23, LIVESTOCK GRAZING

If all the ranchers interviewed "said that they would not run more cattle on their BLM allotments, even if they were allowed to", why propose a 1.7% increase in AUMs over the three to five year licensed use, as stated in the preferred alternative. We find the statement a little incredulous when considering local attitudes.

PAGE 3-24, WILDLIFE HABITAT

What is really gained in the EIS when statements such as "most interviewers did not think cattle competed for forage with other big game such as deer or antelope"; "seedings are beneficial to wildlife"; and "cattle do not create that much of a problem on good fishing streams because they usually cannot penetrate the willows and brush" are presented. We feel the EIS should present only documented facts and not wild conjecture.

PAGE 3-30, VEGETATION - THREATENED, ENDANGERED, AND SENSITIVE SPECIES

The statement that "the complete removal of even one plant from any of these populations would be detrimental" seems completely in opposition to the statement "grazing does not seem to have a harmful effect on any of the known populations of these species".

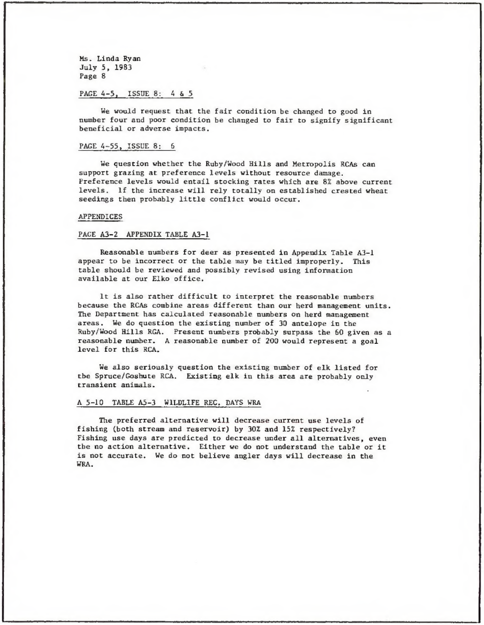
CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

PAGE 4-2

It would seem reasonable that lands suitable for agricultural development be allowed not only under the constraints of water availability, but also under the constraints to protect or preserve all valuable resource values as they presently exist on those lands.

PAGE 4-5, ISSUE 8: TERRESTRIAL WILDLIFE HABITAT, 2

We would suggest that the change in one condition class be based on 10% of the acreage. This would make wildlife consistent with livestock in the percentage for condition class change.



Ms. Linda Ryan
July 5, 1983
Page 8

PAGE 4-5, ISSUE 8: 4 & 5

We would request that the fair condition be changed to good in number four and poor condition be changed to fair to signify significant beneficial or adverse impacts.

PAGE 4-55, ISSUE 8: 6

We question whether the Ruby/Wood Hills and Metropolis RCAs can support grazing at preference levels without resource damage. Preference levels would entail stocking rates which are 8% above current levels. If the increase will rely totally on established crested wheat seedings then probably little conflict would occur.

APPENDICES

PAGE A3-2 APPENDIX TABLE A3-1

Reasonable numbers for deer as presented in Appendix Table A3-1 appear to be incorrect or the table may be titled improperly. This table should be reviewed and possibly revised using information available at our Elko office.

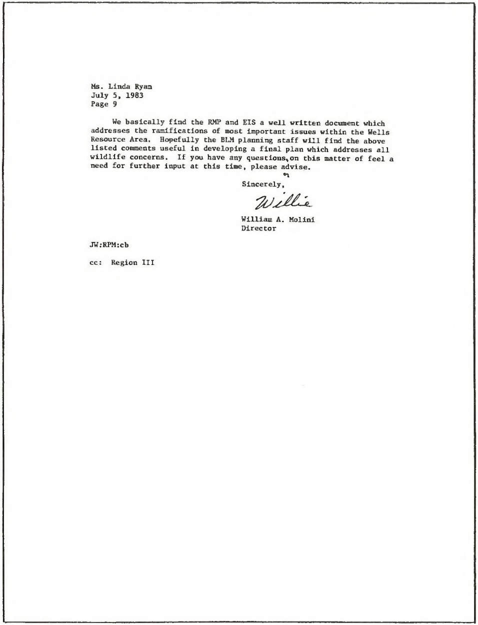
It is also rather difficult to interpret the reasonable numbers because the RCAs combine areas different than our herd management units. The Department has calculated reasonable numbers on herd management areas. We do question the existing number of 30 antelope in the Ruby/Wood Hills RCA. Present numbers probably surpass the 60 given as a reasonable number. A reasonable number of 200 would represent a goal level for this RCA.

We also seriously question the existing number of elk listed for the Spruce/Goshute RCA. Existing elk in this area are probably only transient animals.

A 5-10 TABLE A5-3 WILDLIFE REC. DAYS WRA

The preferred alternative will decrease current use levels of fishing (both stream and reservoir) by 30% and 15% respectively? Fishing use days are predicted to decrease under all alternatives, even the no action alternative. Either we do not understand the table or it is not accurate. We do not believe angler days will decrease in the WRA.

Comment Letter 6



Ms. Linda Ryan
July 5, 1983
Page 9

We basically find the RMP and EIS a well written document which addresses the ramifications of most important issues within the Wells Resource Area. Hopefully the BLM planning staff will find the above listed comments useful in developing a final plan which addresses all wildlife concerns. If you have any questions on this matter of feel a need for further input at this time, please advise.

Sincerely,

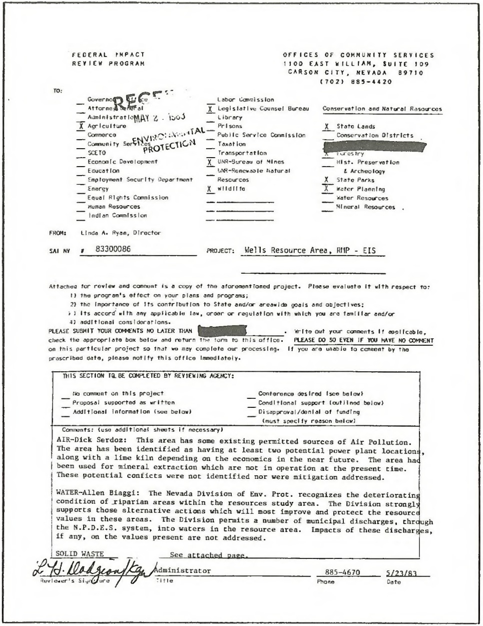
Willie

William A. Molini
Director

JW:RPM:cb

cc: Region III

Comment Letter 6



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1100 EAST WILLIAM, SUITE 109
CARSON CITY, NEVADA 89710
(702) 885-4420

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- ☒ Wildlife
- ☐ ____________
- ☐ ____________
- ☐ ____________

Conservation and Natural Resources

- ☒ State Lands
- ☐ Conservation Districts
- [redacted]
- ☒ Forestry
- ☐ Hist. Preservation & Archeology
- ☒ State Parks
- ☒ Water Planning
- ☐ Water Resources
- ☐ Mineral Resources

FROM: Linda A. Ryan, Director

SAI NV # 83300086

PROJECT: Wells Resource Area, RMP - EIS

Attached for review and comment is a copy of the aforementioned project. Please evaluate it with respect to:

1) the program's effect on your plans and programs;
2) the importance of its contribution to State and/or areawide goals and objectives;
3) its accord with any applicable law, order or regulation with which you are familiar and/or
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PLEASE SUBMIT YOUR COMMENTS NO LATER THAN [redacted]. Write out your comments if applicable, check the appropriate box below and return the form to this office. PLEASE DO SO EVEN IF YOU HAVE NO COMMENT on this particular project so that we may complete our processing. If you are unable to comment by the proscribed date, please notify this office immediately.

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- ☐ No comment on this project
- ☐ Proposal supported as written
- ☐ Additional information (see below)
- ☐ Conference desired (see below)
- ☐ Conditional support (outlined below)
- ☐ Disapproval/denial of funding (must specify reason below)

Comments: (use additional sheets if necessary)

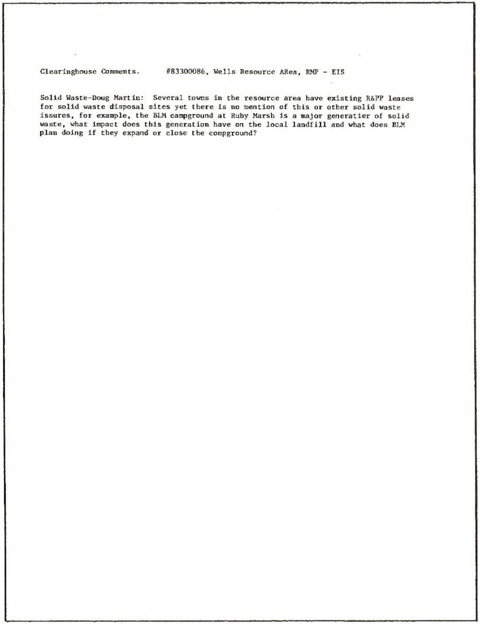
AIR-Dick Serdoz: This area has some existing permitted sources of Air Pollution. The area has been identified as having at least two potential power plant locations, along with a lime kiln depending on the economics in the near future. The area had been used for mineral extraction which are not in operation at the present time. These potential conficts were not identified nor were mitigation addressed.

WATER-Allen Biaggi: The Nevada Division of Env. Prot. recognizes the deteriorating condition of riparian areas within the resources study area. The Division strongly supports those alternative actions which will most improve and protect the resource values in these areas. The Division permits a number of municipal discharges, through the N.P.D.E.S. system, into waters in the resource area. Impacts of these discharges, if any, on the values present are not addressed.

SOLID WASTE See attached page.

Reviewer's Signature: L. H. Dodgeon/kgr
Title: Administrator
Phone: 885-4670
Date: 5/23/83

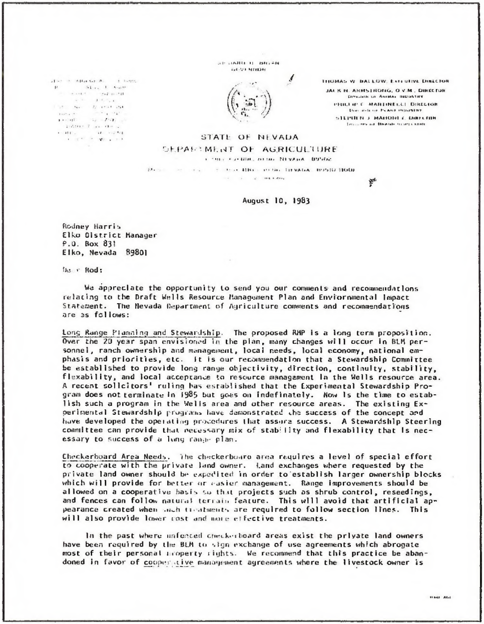
Comment Letter 6



Clearinghouse Comments. #83300086, Wells Resource ARea, RMP - EIS

Solid Waste-Doug Martin: Several towns in the resource area have existing R&PP leases for solid waste disposal sites yet there is no mention of this or other solid waste issures, for example, the BLM campground at Ruby Marsh is a major generatier of solid waste, what impact does this generation have on the local landfill and what does BLM plan doing if they expand or close the compground?

Comment Letter 7



RICHARD H. BRYAN
GOVERNOR

THOMAS W. BALLOW, EXECUTIVE DIRECTOR
JACK N. ARMSTRONG, D.V.M., DIRECTOR
DIVISION OF ANIMAL INDUSTRY
PHILIP F. MARTINELLI, DIRECTOR
DIVISION OF PLANT INDUSTRY
STEPHEN J. MAHONEY, DIRECTOR
DIVISION OF BRAND INSPECTION

STATE OF NEVADA
DEPARTMENT OF AGRICULTURE
[illegible] NEVADA [illegible]
[illegible] NEVADA [illegible]

August 10, 1983

Rodney Harris
Elko District Manager
P.O. Box 831
Elko, Nevada 89801

Dear Rod:

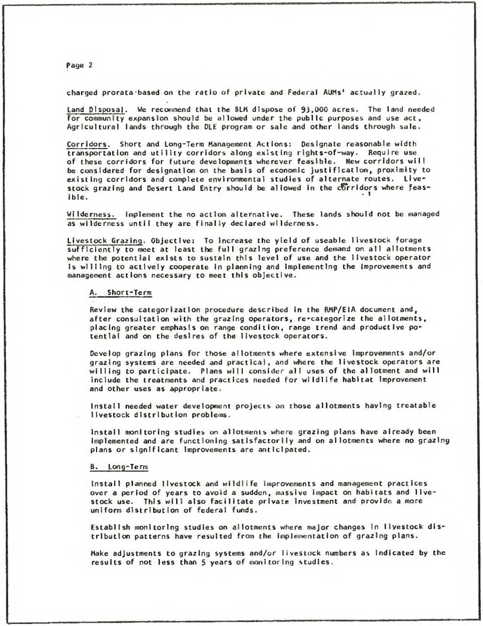
We appreciate the opportunity to send you our comments and recommendations relating to the Draft Wells Resource Management Plan and Enviornmental Impact Statement. The Nevada Department of Agriculture comments and recommendations are as follows:

Long Range Planning and Stewardship. The proposed RMP is a long term proposition. Over the 20 year span envisioned in the plan, many changes will occur in BLM personnel, ranch ownership and management, local needs, local economy, national emphasis and priorities, etc. It is our recommendation that a Stewardship Committee be established to provide long range objectivity, direction, continuity, stability, flexability, and local acceptance to resource managament in the Wells resource area. A recent solicitors' ruling has established that the Experimental Stewardship Program does not terminate in 1985 but goes on indefinately. Now is the time to establish such a program in the Wells area and other resource areas. The existing Experimental Stewardship programs have demonstrated the success of the concept and have developed the operating procedures that assure success. A Stewardship Steering committee can provide that necessary mix of stability and flexability that is necessary to success of a long range plan.

Checkerboard Area Needs. The checkerboard area requires a level of special effort to cooperate with the private land owner. Land exchanges where requested by the private land owner should be expedited in order to establish larger ownership blocks which will provide for better or easier management. Range improvements should be allowed on a cooperative basis so that projects such as shrub control, reseedings, and fences can follow natural terrain feature. This will avoid that artificial appearance created when such treatments are required to follow section lines. This will also provide lower cost and more effective treatments.

In the past where unfenced checkerboard areas exist the private land owners have been required by the BLM to sign exchange of use agreements which abrogate most of their personal property rights. We recommend that this practice be abandoned in favor of cooperative management agreements where the livestock owner is

Comment Letter 7



Page 2

charged prorata based on the ratio of private and Federal AUMs' actually grazed.

Land Disposal. We recommend that the BLM dispose of 93,000 acres. The land needed for community expansion should be allowed under the public purposes and use act, Agricultural lands through the DLE program or sale and other lands through sale.

Corridors. Short and Long-Term Management Actions: Designate reasonable width transportation and utility corridors along existing rights-of-way. Require use of these corridors for future developments wherever feasible. New corridors will be considered for designation on the basis of economic justification, proximity to existing corridors and complete environmental studies of alternate routes. Livestock grazing and Desert Land Entry should be allowed in the corridors where feasible.

Wilderness. Implement the no action alternative. These lands should not be managed as wilderness until they are finally declared wilderness.

Livestock Grazing. Objective: To increase the yield of useable livestock forage sufficiently to meet at least the full grazing preference demand on all allotments where the potential exists to sustain this level of use and the livestock operator is willing to actively cooperate in planning and implementing the improvements and management actions necessary to meet this objective.

A. Short-Term

Review the categorization procedure described in the RMP/EIA document and, after consultation with the grazing operators, re-categorize the allotments, placing greater emphasis on range condition, range trend and productive potential and on the desires of the livestock operators.

Develop grazing plans for those allotments where extensive improvements and/or grazing systems are needed and practical, and where the livestock operators are willing to participate. Plans will consider all uses of the allotment and will include the treatments and practices needed for wildlife habitat improvement and other uses as appropriate.

Install needed water development projects on those allotments having treatable livestock distribution problems.

Install monitoring studies on allotments where grazing plans have already been implemented and are functioning satisfactorily and on allotments where no grazing plans or significant improvements are anticipated.

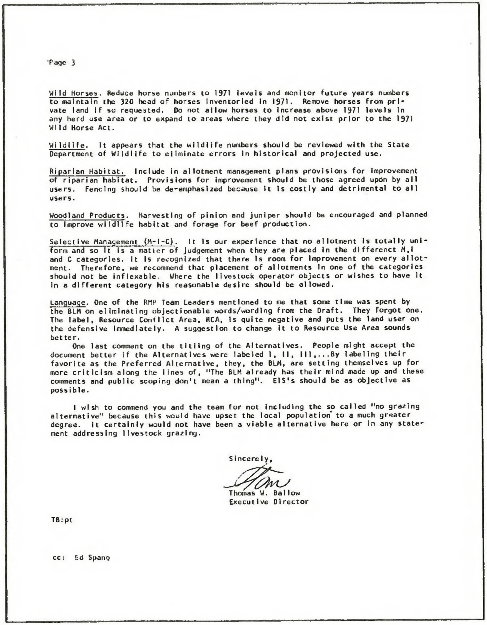
B. Long-Term

Install planned livestock and wildlife improvements and management practices over a period of years to avoid a sudden, massive impact on habitats and livestock use. This will also facilitate private investment and provide a more uniform distribution of federal funds.

Establish monitoring studies on allotments where major changes in livestock distribution patterns have resulted from the implementation of grazing plans.

Make adjustments to grazing systems and/or livestock numbers as indicated by the results of not less than 5 years of monitoring studies.

Comment Letter 7



Page 3

Wild Horses. Reduce horse numbers to 1971 levels and monitor future years numbers to maintain the 320 head of horses inventoried in 1971. Remove horses from private land if so requested. Do not allow horses to increase above 1971 levels in any herd use area or to expand to areas where they did not exist prior to the 1971 Wild Horse Act.

Wildlife. It appears that the wildlife numbers should be reviewed with the State Department of Wildlife to eliminate errors in historical and projected use.

Riparian Habitat. Include in allotment management plans provisions for improvement of riparian habitat. Provisions for improvement should be those agreed upon by all users. Fencing should be de-emphasized because it is costly and detrimental to all users.

Woodland Products. Harvesting of pinion and juniper should be encouraged and planned to improve wildlife habitat and forage for beef production.

Selective Management (M-I-C). It is our experience that no allotment is totally uniform and so it is a matter of judgement when they are placed in the differenct M,I and C categories. It is recognized that there is room for improvement on every allotment. Therefore, we recommend that placement of allotments in one of the categories should not be inflexable. Where the livestock operator objects or wishes to have it in a different category his reasonable desire should be allowed.

Language. One of the RMP Team Leaders mentioned to me that some time was spent by the BLM on eliminating objectionable words/wording from the Draft. They forgot one. The label, Resource Conflict Area, RCA, is quite negative and puts the land user on the defensive immediately. A suggestion to change it to Resource Use Area sounds better.

One last comment on the titling of the Alternatives. People might accept the document better if the Alternatives were labeled I, II, III,...By labeling their favorite as the Preferred Alternative, they, the BLM, are setting themselves up for more criticism along the lines of, "The BLM already has their mind made up and these comments and public scoping don't mean a thing". EIS's should be as objective as possible.

I wish to commend you and the team for not including the so called "no grazing alternative" because this would have upset the local population to a much greater degree. It certainly would not have been a viable alternative here or in any statement addressing livestock grazing.

Sincerely,

Tom

Thomas W. Ballow
Executive Director

TB:pt

cc: Ed Spang

Comment Letter 8

2921 NE 53rd Street
Lighthouse Point, Florida 33064
May 28, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
2002 Idaho Street
Elko, Nevada 89801

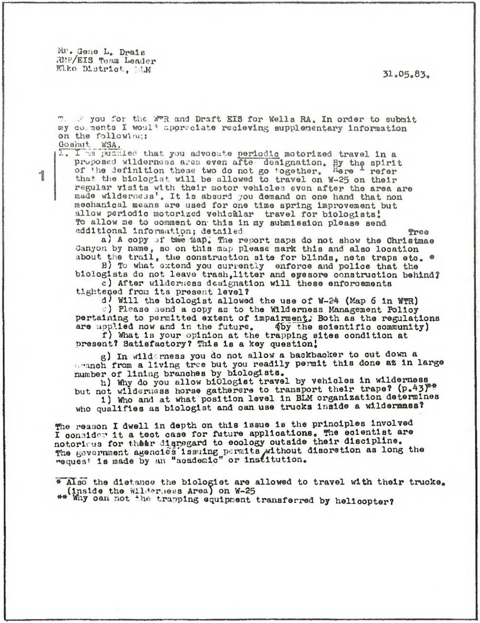
Dear Mr. Harries

Please include this letter in the comments on Draft Wells Resource Management Plan and Environmental Impact Statement. I support the resource protection alternative. This would include designation of 178,951 acres of wilderness in four units. It is important that the remaining ~~the~~ wilderness be saved for wildlife, scenic, recreational, and primitive values. I lived in Nevada for twenty years.

Sincerely,

Reed Secord
Reed Secord

Comment Letter 9



Mr. Gene L. Drais
RMP/EIS Team Leader
Elko District, BLM

31.05.83.

Thank you for the WTR and Draft EIS for Wells RA. In order to submit my comments I would appreciate recieving supplementary information on the following:

Goshut WSA.

1 1. I am puzzled that you advocate periodic motorized travel in a proposed wilderness area even after designation. By the spirit of the definition these two do not go together. Here I refer that the biologist will be allowed to travel on W-25 on their regular visits with their motor vehicles even after the area are made wilderness'. It is absurd you demand on one hand that non mechanical means are used for one time spring improvement but allow periodic motorized vehicular travel for biologists! To allow me to comment on this in my submission please send additional information; detailed

a) A copy of ~~the~~ Tree map. The report maps do not show the Christmas Canyon by name, so on this map please mark this and also location about the trail, the construction site for blinds, nets traps etc. *

B) To what extend you currently enforce and police that the biologists do not leave trash,litter and eyesore construction behind?

c) After wilderness designation will these enforcements tightened from its present level?

d) Will the biologist allowed the use of W-24 (Map 6 in WTR)

e) Please send a copy as to the Wilderness Management Policy pertaining to permitted extent of impairment. Both as the regulations are applied now and in the future. (by the scientific community)

f) What is your opinion at the trapping sites condition at present? Satisfactory? This is a key question!

g) In wilderness you do not allow a backbacker to cut down a branch from a living tree but you readily permit this done in large number of lining branches by biologists.

h) Why do you allow biologist travel by vehicles in wilderness but not wilderness horse gatherers to transport their traps? (p.43)**

i) Who and at what position level in BLM organization determines who qualifies as biologist and can use trucks inside a wilderness?

The reason I dwell in depth on this issue is the principles involved I consider it a test case for future applications. The scientist are notorious for their disregard to ecology outside their discipline. The government agencies issuing permits without discretion as long the request is made by an "academic" or institution.

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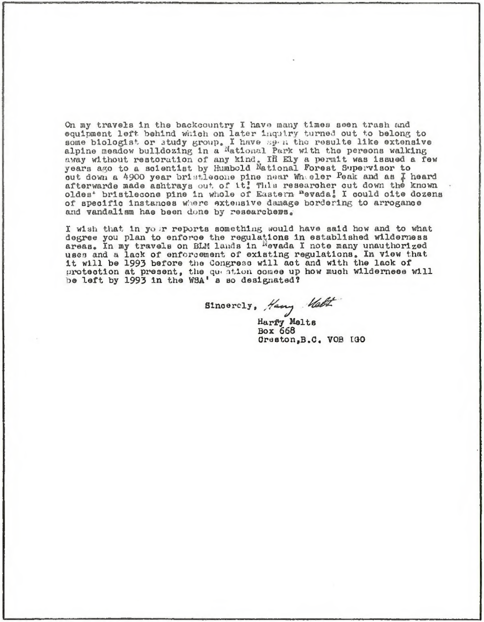
* Also the distance the biologist are allowed to travel with their trucks. (inside the Wilderness Area) on W-25

** Why can not the trapping equipment transferred by helicopter?

Comment Letter 9



On my travels in the backcountry I have many times seen trash and equipment left behind which on later inquiry turned out to belong to some biologist or study group. I have seen the results like extensive alpine meadow bulldozing in a National Park with the persons walking away without restoration of any kind. In Ely a permit was issued a few years ago to a scientist by Humbold National Forest Supervisor to cut down a 4900 year bristlecone pine near Wheeler Peak and as I heard afterwards made ashtrays out of it! This researcher cut down the known oldest bristlecone pine in whole of Eastern Nevada! I could cite dozens of specific instances where extensive damage bordering to arrogance and vandalism has been done by researchers.

I wish that in your reports something would have said how and to what degree you plan to enforce the regulations in established wilderness areas. In my travels on BLM lands in Nevada I note many unauthorized uses and a lack of enforcement of existing regulations. In view that it will be 1993 before the Congress will act and with the lack of protection at present, the question comes up how much wilderness will be left by 1993 in the WSA's so designated?

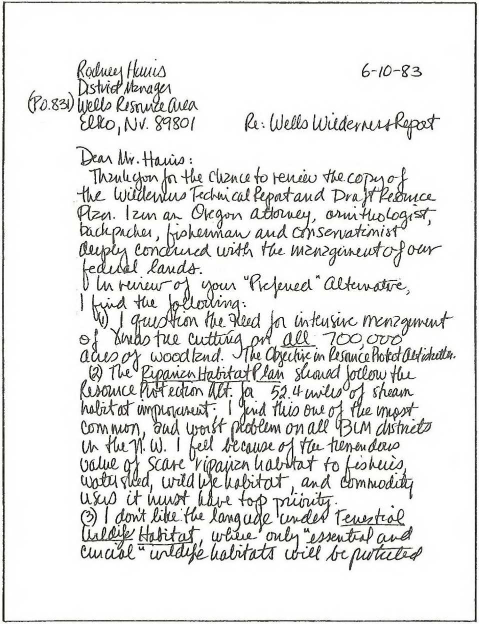
Sincerely, Harry Melts

Harfy Melts
Box 668
Creston,B.C. VOB IGO

Response Letter 9

RESPONSE

1 Decisions on allowable uses in designated wilderness areas will be made only after development of wilderness management plans. This process includes opportunities for public participation and review of draft management plans.



Rodney Harris
District Manager
(P.O. 831) Wells Resource Area
Elko, NV. 89801

6-10-83

Re: Wells Wilderness Report

Dear Mr. Harris:

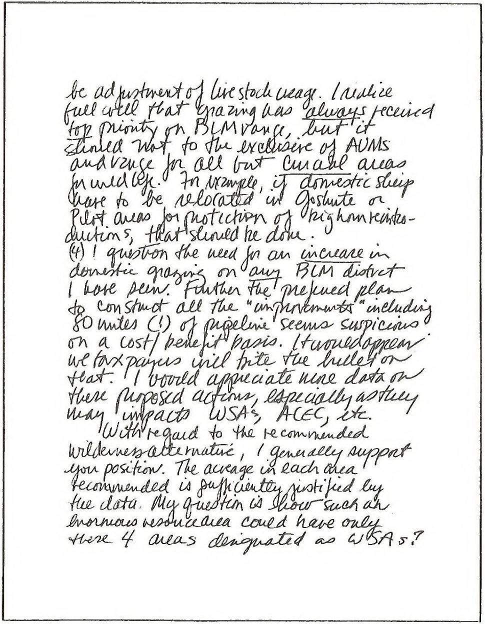
Thank you for the chance to review the copy of the Wilderness Technical Report and Draft Resource Plan. I am an Oregon attorney, ornithologist, backpacker, fisherman and conservationist deeply concerned with the management of our federal lands.

In review of your "Preferred" Alternative, I find the following:

(1) I question the need for intensive management of Xmas tree cutting on all 700,000 acres of woodland. The Objective in Resource Protect Alt is better.

(2) The Riparian Habitat Plan should follow the Resource Protection Alt. for 52.4 miles of stream habitat improvement. I find this one of the most common, and worst problem on all BLM districts in the N.W. I feel because of the tremendous value of scarce riparian habitat to fisheries, watershed, wildlife habitat, and commodity uses it must have top priority.

(3) I don't like the language under Terrestrial Wildlife Habitat, where only "essential and crucial" wildlife habitats will be protected



by adjustment of livestock usage. I realize full well that grazing has always received top priority on BLM range, but it should not to the exclusive of AUMs and range for all but crucial areas for wildlife. For example, if domestic sheep have to be relocated in Goshute or Pilot areas for protection of bighorn reintroductions, that should be done.

(4) I question the need for an increase in domestic grazing on any BLM district I have seen. Further the preferred plan to construct all the "improvements" including 80 miles (!) of pipeline seems suspicious on a cost/benefit basis. It would appear we taxpayers will bite the bullet on that. I would appreciate more data on these proposed actions, especially as they may impacts WSA's, ACEC, etc.

With regard to the recommended wilderness alternative, I generally support you position. The acreage in each area recommended is sufficiently justified by the data. My question is how such an enormous resource area could have only these 4 areas designated as WSAs?

Comment Letter 10

I am sorry I was not involved in the earlier stages of the WSA inventory on your district.

Of special importance to me are the protection of the areas & conditions in the Goshute & Bluebell WSA that protect the tremendous raptor migrations. When are the peaks of these migrations — October & March?

Thank you for the opportunity to comment on your documents. Please keep me advised on the progress of these plans, and what WSAs are recommended to & by the State Director.

Sincerely,

Jeffrey Cook

27691 SE Haley Rd
Boring Or 97009

Comment Letter 11

Mr. Rodney Harris
Elko District Manager Attn, RMP/EIS Team Leader 28.06.83.
Elko, NV 89801

Subject: Comments on the Draft Wells RA Draft RMP/EIS.

Personal Background: Even I spend summers in Canada ,spring,winter and Fall is often spent in Nevada, Arizona and Utah. I do not belong to any organizations advocating pro or against wilderness. I am a recreational wilderness user with main activities:day hiking and camping.

First a few general comments followed comments on specific WSA's.

I support the Preferred Alternative. Items I strongly support in it:

1. Acquiring of legal public access. In the past I have been unable to visit and enjoy many BLM areas due to lack of easements for access resulting many BLM lands becoming de facto private possessions not open to the public. Access becomes even more important, taking into considerations that majority of users are one-day users from their vehicles. Therefore legal public access and designated access corridors are important. I am pleased that the Preferred Alternative specifies the most miles for aquiring public legal access.

2. Springs are important to all users. Spring improvements should be done so that assure potable water for the camper and hiker barring animals from the well head's immediate vicinity to prevent contamination.

* * * * *

3. Grazing should be excluded in specific areas so that examples of ungrazed natural native vegetative areas can be viewed for quality wilderenss experience. This is specially valid where wildflower displays occur. Support a decrease in AUM's.

Fire Management. Fire management of lightning caused fires should allow a minimum area to burn over in order to keep part of WSA's in natural state.

Scientific use of WSA's for research. Nevada has a sad record allowing public lands damaged by being lax in control of damaging single purpose activities by institutions and "academics". Permits are issued without safeguards to environmental damage.We have witnessed the issuance of permit to cut down the oldest known bristlecone tree (4900 years) in Ely District near Wheeler Peak. Frequently litter, traps, cut trees and branches are left after departure. People getting study permits should required to issue a bond to cover the cost of rehabilation if it is required, more so in WSA's. Management policies are there, enforcement is not.

page 2

Goshute Peak WSA

Support the Preferred Alternative, but with the following exceptions:

2 1. Eliminate Area B (map 2-4 RMP).
It will eliminate from WA no fewer than seven existing Ways,(W19 to W25)and part of W26. It will eliminate the W24 which you intend for regular use by motorized vehicles by raptor study biologists even after WA is declared. For more details to my objections are outlined in my letter of 31.05.83. Your reply (your ref. 8500 (NV-017) dated June 16th 83 supplied additional information. I still object a regularly occuring motorized use

1 in a wilderness area, my objection is based on that the motorized use in this case is avoidable, non-essential to management of this specific wildernass if designated as such. Even your WMP states that "Research and other studies will be conducted without use of motorized equipment or construction of temporary structures" True,the State Director can make exceptions to this policy in projects that are essential to management of the specific wilderness where no other feasible alternatives exist. Trapping of raptors is not essential to management of this WA. Trapping of raptors is not in the same category as trapping of wildhorses. Wildhorses are an introduced species, excessive numbers will ~~make~~ cause ecological damage. Further WMP states "...where no other feasible alternatives exist". Your own WTR on page 43 states "Vehicular access should be allowed up Christmas Tree Canyon to the terminal end of W24. This would enable persons to haul necessary equipment for trapping operations to the base of the mountain before having to carry it on foot to the top". If it is feasible to carry this equipment on foot a longer distance on foot trail up a steep mountain side then it must be also feasible to carry this equipment a shorter distance through section 36 on a way (W24). Obiously raptor trapping does not qualify for exception for motorized vehicle use,once WA is declared.

1 Elimination of Area "B" eliminates part of the problem. If trapping is unavoidable due to pressure from biologists then the trap area (section 35 should also be eliminated from the proposed WA.

I disagree with your statement on page 43 that the above trapping activites are not expected to impair the wilderness character of the area. A birdwatcher and/or wilderness visitor sure will object to the howling of engines and trapping of birds.All this will undermine the integrity of Wilderness Area principles.

Elimination of area B will also eliminate some opposition from mining claim owners and objections based that "B" is a good mineral potential area.

3 2. Eliminate a small part of area D by having boundary line follow W17 to its terminal ,follow section line to W16 then along W16 until it joins the proposed boundary. This will also eliminate a fence line within it. Since the new boundary will follow mostly the two ways it should not pose management difficulties.

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page 3 of 3

3. Classify as non-suitable area F.
4 Elimination of this narrow strip will exclude from the proposed WA no less than eight ways (W2 to W9). These short ways then will be ideal for recreational camper to leave a road with its traffic and dust and greatly increase the quality of his camping experience.

BLUEBELL WSA

I support the Preferred Alternative and agree with your observation that the Morgan Rd should be left open for motorized travel.

In conclusion, I found the WTR and RMP drafts well prepared and very informative. These documents provide ideas where to go in the future and no doubt will increase the recreational visits to Wells RA Recreational use is a function of information available. I hope considerations will be given where the futura trailheads, campsites and parking areas will be before the final wildernass boundaries are established.

Sincerely, Harry Melte

Harry Melte
Box 668
Creston,BC VOB IGO
Canada

Response Letter 11

RESPONSE

1 The BLM Wilderness Management Policy (pages 14-30) identifies the specific guidelines which will be used in developing a Wilderness Management Plan for each BLM-administered wilderness area. These detailed plans will include decisions to allow or disallow motor vehicle use and activities such as trapping operations. Additionally, the plans will specify the frequency, magnitude etc. of various activities occurring in wilderness areas.

2 Elimination of "Area B" would only result in the deletion of ways W-24, W-25 and W-26, a total of about three miles, from the Wilderness Area. Ways W-19, W-20, W-21, W-22, W-23 and W-24 were deleted from the Wilderness Area (Area "C") in the Midrange (Preferred) Alternative. Additionally, there are no mining claims in Area "B" and anticipated conflicts with minerals were deleted in the Preferred Alternative; lands adjacent to the Ferguson Mining District were recommended nonsuitable.

3. The existing ways and fence in area "D" are substantially unnoticeable and are not anticipated to present future manageability problems. The ways are infrequently traveled. The elimination of the area you propose would result in an odd configuration in the southwest portion of the Wilderness Area, which could result in future manageability problems.

4. Ways W-2 and W-9 are substantially unnoticeable, are rarely traveled, are rehabilitating naturally, and are not anticipated to present future manageability problems. The Wells Resource Area contains numerous areas outside the boundaries of the Goshute Peak WSA which are suitable for recreational camping.

Statement of Bob Wright on Wells Draft Resource Management Plan and Enviornmental Impact Statement.

After reviewing the Draft Plan and Statement I wish to make some comments in regard to it. One of the purposes of the development of the plan was to identify the habitat condition of the lands managed by the Bureau. Actual field forage inventories were made in the Wells Resourse area. Yet in reviewing the habitat condition for wildlife about one-fourth of the mule deer and two thirds of the antelope ranges are listed as in unknown condition. To the Natural Resource Defense Council, who was responsible for the E.I.S.'s, this is only telling them that the Bureau hasn't done their homework and invites court action. They have already initiated court action on two E.I.S's. in Nevada. Surely the Bureau people know range conditions sufficiently to rate them in something other than unknown.

It seems rather odd that the antelope range did not rate in good or fair condition, only poor or unknown. That, to me, seems irresponsibly done as antelope and livestock basically have the same grazing habits and three fourths of the livestock ranges were rated as being excellent, good or fair condition. Some of the finest specimens of antelope are being taken in the Wells Resource Area which speaks well for the forage available.

The request of the Nevada Department of Wildlife that deer herds be doubled in numbers and antelope herds be increased by 400% is unrealistic. Both private lands and public lands within the resource area could not handle that many. Wildlife numbers have increased dramatically over the last forty to fifty years while livestock numbers have decreased. If wildlife numbers are allowed to increase at that rate then livestock numbers should also be increased.

Ex. [illegible]

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2) Bob Wright

The modification of fences to accomodate wildlife would be an expensive undertaking and not cost effective. In areas where wildlife frequently graze, such as meadows and irrigated pastures, seldom does one get hung up in a fence. If the 650 miles of fence is modified the wildlife department should make arrangements to stand the cost of the project.

I did not find much reference in the plan to the damage being done by four wheel drive vehicles used by hunters and recreationists. In some areas just about every ridge is getting a road started and with the increased moisture the past year erosion is taking place on these roads. In fact one road I have seen this spring has washed to a depth of ten to twelve feet. This should be addressed in the plan.

In regard to livestock grazing in the Wells Resource area I find very little mention of the suspended non-use A.U.M's and their relationship to the active use. All comparisons in the management actions are made on a 3 to 5 year use. The preferred alternative shows a 2% increase in A.U.M.'s when actually it is a 23½% decrease when compared to the active preference. The only alternative that shows any increase in livestock grazing is the Resource Production one, that being about 3%.

The improvements proposed in the preferred alternative for livestock grazing is not adequate. Only 27,000 acres are identified as reseeding whereas the Resource Production alternative identifies 232,000 acres. More water wells should be drilled and springs developed along with pipelines to obtain better distribution of livestock and wildlife use. Much research has been done on prescribe burning and spraying. Only 29,500 acres are being proposed. Economics will be such that burning will have to be used more. Seeding within the burns and sprayings should be considered using

Comment Letter 12

3) Bob Wright

native species as well as the wheat grasses. Seeding would also help reduce the increase of rabbit brush in the treated areas.

I find nothing in the plan that shows the economic contribution of the wild horse herds to the resource area. If no-one is viewing the horses and no economic or emotional good is being provided then the roughly 600 head herd is hard to justify. The forage they consume would be better allocated to wildlife or livestock.

The three wilderness areas being proposed in the Spruce - Goshutes seem to be more than adequate for that type of wilderness. One wilderness area could just as well suffice and adequately provide for that demand.

After the tour last year of the riparian-stream habitat in the O'Neil and Mary's River area and the sentiment expressed by the persons present I find it difficult to believe that the Bureau is proposing the actions they are. More research needs to be done before such an ambitious program is undertaken. It is my understanding that some fencing of riparian zones has not been beneficial and have been removed. To construct 95 miles of fence along stream banks in a deep snow country doesn't seem very worthwhile.

After reviewing the various alternatives proposed the one that I feel the most acceptable is the no action one. It is a continuation of the present practices and uses, making decisions on a case by case basis. It is tried and tested. When one views the waving grass, the blossoming shrubs, and the excellent condition of wildlife and livestock in the Wells Resource Area then some degree of successful land management has been attained.

The alternative being developed by the grazing board would have to be evaluated when it is finalized but it would surely be more acceptable than any of the alternatives proposed in the plan.

Comment Letter 13

AtlanticRichfieldCompany 555 Seventeenth Street
Denver, Colorado 80217
Telephone 303 575 7577

J. R. Mitchell
Public Lands Coordinator

July 26, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P.O. Box 831
Elko, Nevada 89801

Re: Draft Wells Resource Area
Resource Management Plan

Dear Mr. Harris:

Atlantic Richfield Company appreciates having this opportunity to provide comments to the Bureau of Land Management (BLM) on the Draft Resource Management Plan (RMP) for the Wells Resource Area, Nevada.

Atlantic Richfield strongly supports a balanced approach to the multiple use of our nation's public lands, and believes that the BLM should fully consider energy and mineral resources in its planning procedures. As an initial phase in planning for the Wells Resource Area, the BLM identified a list of ten issues of concerns, including such items as recreation, wilderness, livestock and wildlife. However, energy and minerals was not listed as a planning issue, and we question whether this important class of resources has received consideration as a full and equal use of our public lands.

As you may be aware, Atlantic Richfield holds substantial property interest in a portion of the Wells Resource Area known as the Elko Fairway, which in our estimation harbors high potential for the development of oil and gas. Our evaluation of the Preferred Alternative's recommendations for this tract did not reveal any proposed restrictions or special area designations that would hinder development of this area's resources. Because of its development potential, we believe that restrictive stipulations should not be adopted for the Elko Fairway.

1 We strongly recommend that the BLM fully consider the information now available in the Geology-Energy-Minerals (G-E-M) reports which have been completed for many BLM wilderness study areas in Nevada. These

Mr. Rodney Harris
July 26, 1983
Page 2

reports contain useful information on the development potential of specific areas. With respect to particular wilderness proposals in the Wells Resource Area, we agree with the G-E-M report's recommendation for the South Pequop area that detailed mapping of phosphate occurrences be completed to determine how significant these occurrences are, and that geochemical sampling be undertaken to check for the presence of metallic mineral occurrences. The G-E-M report for the Bluebell/Goshute Peak areas contains a great deal of information on their mineralization that should be considered in planning. We concur in 1 the report's conclusion that reconnaissance and geochemical sampling be used to determine if there are unknown mineralized or altered areas within this tract. These activities will help broaden the resource information base that is essential to informed, rational land use decisions. We encourage the BLM to re-evaluate its preliminary recommendations for wilderness suitability using the additional information now available in the G-E-M reports. Because of these areas' mineral potential, we believe the wilderness acreage as contained in the Resource Production Alternative is preferable to that recommended in the Preferred Alternative.

We are also concerned over the proposed application of time of year restrictions on leasable and/or saleable minerals to protect crucial deer winter range and sage grouse strutting habitat. For example, if there is a mining operation within an area subject to a seasonal stipulation, would the mine have to temporarily cease operations? Such closure would certainly have a severe economic impact on operations at the site.

In summary, we encourage the BLM to more fully consider energy and mineral resources in the plan for the Wells Resource Area, and to incorporate information contained in the recently completed G-E-M studies. Such consideration will help the BLM fulfill its multiple use mandates for public land management.

Mr. Rodney Harris
July 26, 1983
Page 3

Thank you for this opportunity to provide these comments. Please contact this office if we can be of further assistance in your planning effort.

Sincerely,

Jay R. Mitchell

J. R. Mitchell

JRM:JFO:drm

Response Letter 13

RESPONSE

1 Geology, Energy and Minerals (G.E.M.) assessments were prepared for all WSAs in the Wells Resource Area end were fully considered in the wilderness suitability recommendations.

Comment Letter 14

P.O. Box 299
Blairmore, Alberta
Canada TOK OE0
July 27, 1983

Rodney Harris,
Cherles Boyer & Gene Drais
BIM Elko District
Elko, Nevads

Dear Sirs:

I recently received your DRAFT WELLS ~~RMP/EIS,~~ and I am writing to express my concerns on the potential wilderness in the Wells Resource Area.

I em pleesed to reed in your Preferred Alternative that you are recommending as suitable for wilderness protection most of the area in each of your four W.S.A's.

The Bed Lands WSA (NV 010-184) is especially important, as it is terrein (end vegetation end animals) different from most other WSA's. Unless I am mistaken, it appears thet the entire BLM wilderness review process throughout all the western Stetes is considering or recommending almost only rugged rocky mountain renges or heevily wooded ereas. But, pleese, let's have some desert velleys, too, whether "outstending solitude" is present or not! Remember, diversity and educational/scientific values are also important for the National Wilderness Preservation System.

Therefore, I repeet, the Bed Lends WSA is especielly valueble as it edds diversity to the Wilderness Preservation System. Thank you for recommending it for wilderness protection.

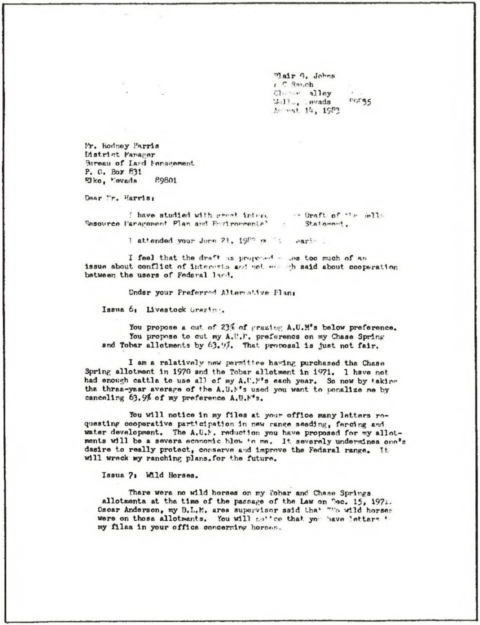
Yours sincerely,

Elliott Bernshaw

Elliott Bernshaw
A U.S. citizen, and an
edmirer of "wild Nevada"

COPY TO: EDWARD SPANG,
NEVADA STATE B.L.M. DIRECTOR

P.S.: It's too bad that you don't see fit to edd substantially to your recommended 8,415 acres for the Bad Lends WSA by reconsidering parts of the deleted sections of this WSA. Your inventory reports thet areas of 5,400, 11,100 and 15,280 acres are natural, but were deleted largely because they are "flat" and thus lack "outstanding opportunities for solitude."



Blair G. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835
August 14, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

I have studied with great interest [illegible] Draft of the Wells Resource Management Plan and Environmental [illegible] Statement.

I attended your June 21, 1983 public hearing.

I feel that the draft as proposed makes too much of an issue about conflict of interests and not enough said about cooperation between the users of Federal land.

Under your Preferred Alternative Plan:

Issue 6: Livestock Grazing.

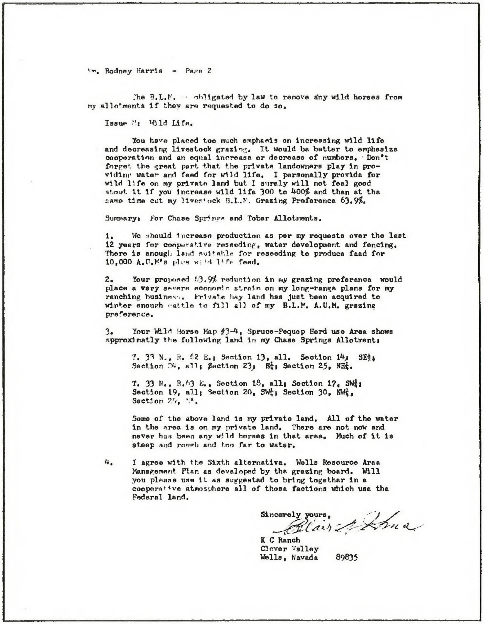
You propose a cut of 23% of grazing A.U.M's below preference. You propose to cut my A.U.M. preference on my Chase Spring and Tobar allotments by 63.9%. That proposal is just not fair.

I am a relatively new permittee having purchased the Chase Spring allotment in 1970 and the Tobar allotment in 1971. I have not had enough cattle to use all of my A.U.M's each year. So now by taking the three-year average of the A.U.M's used you want to penalize me by canceling 63.9% of my preference A.U.M's.

You will notice in my files at your office many letters requesting cooperative participation in new range seeding, fencing and water development. The A.U.M. reduction you have proposed for my allotments will be a severe economic blow to me. It severely undermines one's desire to really protect, conserve and improve the Federal range. It will wreck my ranching plans.for the future.

Issue 7: Wild Horses.

There were no wild horses on my Tobar and Chase Springs allotments at the time of the passage of the Law on Dec. 15, 1971. Oscar Anderson, my B.L.M. area supervisor said that "No wild horses were on those allotments. You will notice that you have letters in my files in your office concerning horses.



Mr. Rodney Harris - Page 2

The B.L.M. is obligated by law to remove any wild horses from my allotments if they are requested to do so.

Issue 8: Wild Life.

You have placed too much emphasis on increasing wild life and decreasing livestock grazing. It would be better to emphasize cooperation and an equal increase or decrease of numbers. Don't forget the great part that the private landowners play in providing water and feed for wild life. I personally provide for wild life on my private land but I surely will not feel good about it if you increase wild life 300 to 400% and then at the same time cut my livestock B.L.M. Grazing Preference 63.9%.

Summary: For Chase Springs and Tobar Allotments.

1. We should increase production as per my requests over the last 12 years for cooperative reseeding, water development and fencing. There is enough land suitable for reseeding to produce feed for 10,000 A.U.M's plus wild life feed.

2. Your proposed 63.9% reduction in my grazing preference would place a very severe economic strain on my long-range plans for my ranching business. Private hay land has just been acquired to winter enough cattle to fill all of my B.L.M. A.U.M. grazing preference.

3. Your Wild Horse Map #3-4, Spruce-Pequop Herd use Area shows approximatly the following land in my Chase Springs Allotment:

T. 33 N., R. 62 E.; Section 13, all. Section 14, SE¼; Section 24, all; $ection 23, E½; Section 25, NE¼.

T. 33 N., R.63 E., Section 18, all; Section 17, SW¼; Section 19, all; Section 20, SW¼; Section 30, NW¼, Section 29, [illegible].

Some of the above land is my private land. All of the water in the area is on my private land. There are not now and never has been any wild horses in that area. Much of it is steep and rough and too far to water.

4. I agree with the Sixth alternative. Wells Resource Area Management Plan as developed by the grazing board. Will you please use it as suggested to bring together in a cooperative atmosphere all of those factions which use the Federal land.

Sincerely yours,
Blair G. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835

Comment Letter 16

Nevada Grazing Board of District #1
Post Office Box 52
Elko, Nevada 89801
(702) 738-5716

August 12, 1983

Mr. Rod Harris
District Manager
Interior Department
Bureau of Land Management
2002 Idaho Street
Elko, Nevada 89801

Dear Mr. Harris:

Enclosed are our comments on the Wells Resource Area Resource Management Plan and Environmental Impact Statement. Also enclosed is an alternative we are suggesting for the Resource Management Plan.

Please consider these documents carefully when you are preparing the final EIS and are selecting the alternative implementation.

Very truly yours,

Roy Young

Roy Young, Chairman

RY/sa

Comment Letter 16

NEVADA GRAZING BOARD OF DISTRICT N-1
COMMENTS ON WELLS RESOURCE AREA RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT
by Lester A. McKenzie

GENERAL COMMENTS:

Page 2-1, Resource Conflict Areas:
Dividing the Resource Area into units with similar problems probably expedited the preparation of the RMP and EIS. The choice of the word 'Conflict' was unfortunate, however, because it indicates the authors had preconceived conclusions about the interaction between the resources prior to starting on the RMP and EIS. The use of this term establishes a negative tone for the whole document.

Page 2-2, last sentence of 2nd paragraph under 'Selective Management Criteria':
'All range improvement projects proposed in this document are for category 'I' allotments.'

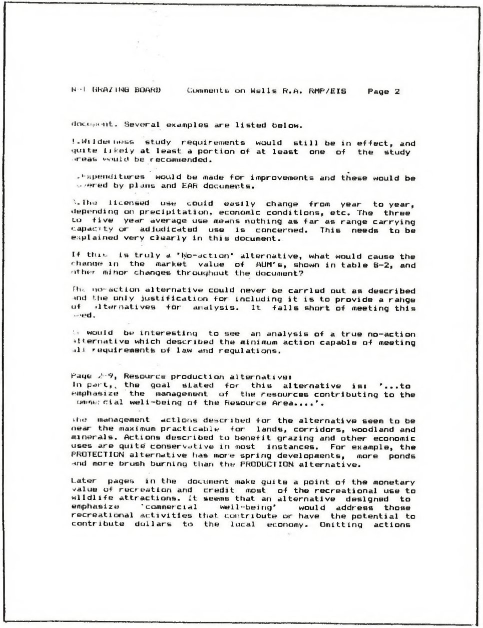
According to this, only 25 of the 89 allotments would have any improvement work done. Many 'C' and 'M' allotments have rather serious livestock distribution problems that can be solved only by installing water developments and fencing. Are these allotments to be ignored until management plans have been implemented on all of the 'I' allotments?

Page 2-2, last sentence of 2nd paragraph under 'Management Alternatives':
'No specific management actions will be analyzed for R/C areas ....'

This sentence (read together with map 2-7) seems to say that no work will be done outside of the checkerboard pattern. Surely this is not what was intended!

The subject of Disposal, R/C and R/M is confusing and should be explained in greater detail.

Page 2-7, No-action alternative:
The alternative as written is not realistic. Continuation of present uses and levels would still require compliance with law and with Washington and State office directives. Actual practice would be considerably different from the picture painted by the description of the No-Action alternative contained in this



N-1 GRAZING BOARD Comments on Wells R.A. RMP/EIS Page 2

document. Several examples are listed below.

1.Wilderness study requirements would still be in effect, and quite likely at least a portion of at least one of the study areas would be recommended.

2.Expenditures would be made for improvements and these would be covered by plans and EAR documents.

3.The licensed use could easily change from year to year, depending on precipitation, economic conditions, etc. The three to five year average use means nothing as far as range carrying capacity or adjudicated use is concerned. This needs to be explained very clearly in this document.

If this is truly a 'No-action' alternative, what would cause the change in the market value of AUM's, shown in table 6-2, and other minor changes throughout the document?

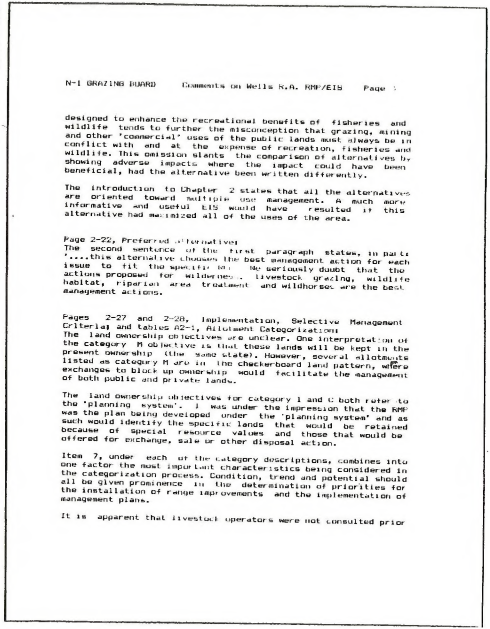
The no-action alternative could never be carried out as described and the only justification for including it is to provide a range of alternatives for analysis. It falls short of meeting this need.

It would be interesting to see an analysis of a true no-action alternative which described the minimum action capable of meeting all requirements of law and regulations.

Page 2-9, Resource production alternative:
In part,, the goal stated for this alternative is: '...to emphasize the management of the resources contributing to the commercial well-being of the Resource Area....'.

The management actions described for the alternative seem to be near the maximum practicable for lands, corridors, woodland and minerals. Actions described to benefit grazing and other economic uses are quite conservative in most instances. For example, the PROTECTION alternative has more spring developments, more ponds and more brush burning than the PRODUCTION alternative.

Later pages in the document make quite a point of the monetary value of recreation and credit most of the recreational use to wildlife attractions. It seems that an alternative designed to emphasize 'commercial well-being' would address those recreational activities that contribute or have the potential to contribute dollars to the local economy. Omitting actions



N-1 GRAZING BOARD Comments on Wells R.A. RMP/EIS Page 3

designed to enhance the recreational benefits of fisheries and wildlife tends to further the misconception that grazing, mining and other 'commercial' uses of the public lands must always be in conflict with and at the expense of recreation, fisheries and wildlife. This omission slants the comparison of alternatives by showing adverse impacts where the impact could have been beneficial, had the alternative been written differently.

The introduction to Chapter 2 states that all the alternatives are oriented toward multiple use management. A much more informative and useful EIS would have resulted if this alternative had maximized all of the uses of the area.

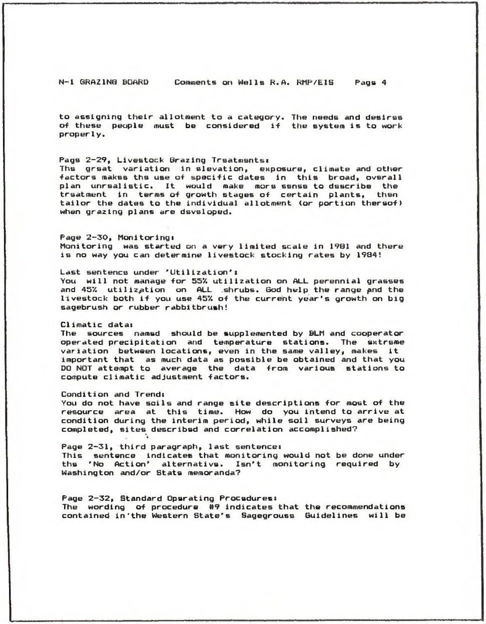
Page 2-22, Preferred alternative:
The second sentence of the first paragraph states, in part: '....this alternative chooses the best management action for each issue to fit the specific [illegible] We seriously doubt that the actions proposed for wilderness, livestock grazing, wildlife habitat, riparian area treatment and wildhorses are the best management actions.

Pages 2-27 and 2-28, Implementation, Selective Management Criteria; and tables A2-1, Allotment Categorization:
The land ownership objectives are unclear. One interpretation of the category M objective is that these lands will be kept in the present ownership (the same state). However, several allotments listed as category M are in the checkerboard land pattern, where exchanges to block up ownership would facilitate the management of both public and private lands.

The land ownership objectives for category 1 and C both refer to the 'planning system'. I was under the impression that the RMP was the plan being developed under the 'planning system' and as such would identify the specific lands that would be retained because of special resource values and those that would be offered for exchange, sale or other disposal action.

Item 7, under each of the category descriptions, combines into one factor the most important characteristics being considered in the categorization process. Condition, trend and potential should all be given prominence in the determination of priorities for the installation of range improvements and the implementation of management plans.

It is apparent that livestock operators were not consulted prior



to assigning their allotment to a category. The needs and desires of these people must be considered if the system is to work properly.

Page 2-29, Livestock Grazing Treatments:
The great variation in elevation, exposure, climate and other factors makes the use of specific dates in this broad, overall plan unrealistic. It would make more sense to describe the treatment in terms of growth stages of certain plants, then tailor the dates to the individual allotment (or portion thereof) when grazing plans are developed.

Page 2-30, Monitoring:
Monitoring was started on a very limited scale in 1981 and there is no way you can determine livestock stocking rates by 1984!

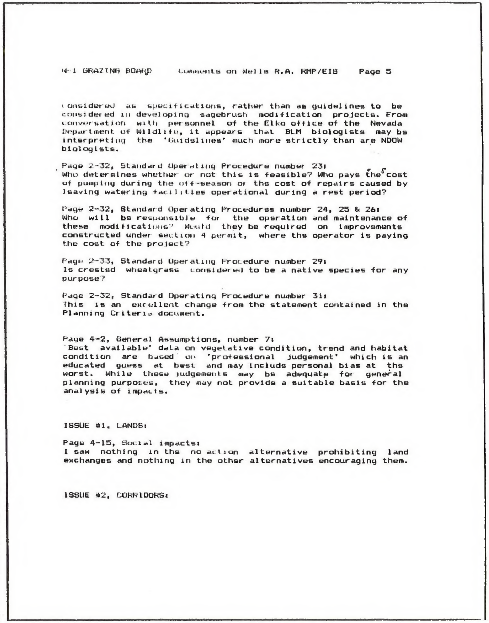
Last sentence under 'Utilization':
You will not manage for 55% utilization on ALL perennial grasses and 45% utilization on ALL shrubs. God help the range and the livestock both if you use 45% of the current year's growth on big sagebrush or rubber rabbitbrush!

Climatic data:
The sources named should be supplemented by BLM and cooperator operated precipitation and temperature stations. The extreme variation between locations, even in the same valley, makes it important that as much data as possible be obtained and that you DO NOT attempt to average the data from various stations to compute climatic adjustment factors.

Condition and Trend:
You do not have soils and range site descriptions for most of the resource area at this time. How do you intend to arrive at condition during the interim period, while soil surveys are being completed, sites described and correlation accomplished?

Page 2-31, third paragraph, last sentence:
This sentence indicates that monitoring would not be done under the 'No Action' alternative. Isn't monitoring required by Washington and/or State memoranda?

Page 2-32, Standard Operating Procedures:
The wording of procedure #9 indicates that the recommendations contained in the Western State's Sagegrouse Guidelines will be



considered as specifications, rather than as guidelines to be considered in developing sagebrush modification projects. From conversation with personnel of the Elko office of the Nevada Department of Wildlife, it appears that BLM biologists may be interpreting the 'Guidelines' much more strictly than are NDOW biologists.

Page 2-32, Standard Operating Procedure number 23:
Who determines whether or not this is feasible? Who pays the cost of pumping during the off-season or the cost of repairs caused by leaving watering facilities operational during a rest period?

Page 2-32, Standard Operating Procedures number 24, 25 & 26:
Who will be responsible for the operation and maintenance of these modifications? Would they be required on improvements constructed under section 4 permit, where the operator is paying the cost of the project?

Page 2-33, Standard Operating Procedure number 29:
Is crested wheatgrass considered to be a native species for any purpose?

Page 2-32, Standard Operating Procedure number 31:
This is an excellent change from the statement contained in the Planning Criteria document.

Page 4-2, General Assumptions, number 7:
`Best available' data on vegetative condition, trend and habitat condition are based on 'professional judgement' which is an educated guess at best and may include personal bias at the worst. While these judgements may be adequate for general planning purposes, they may not provide a suitable basis for the analysis of impacts.

ISSUE #1, LANDS:

Page 4-15, Social impacts:
I saw nothing in the no action alternative prohibiting land exchanges and nothing in the other alternatives encouraging them.

ISSUE #2, CORRIDORS:

Page 4-19, Resource values would be degraded:
Merely designating corridors would have no effect on visual quality, wilderness character or wildlife habitat. The chances that 1,023 miles would be used is extremely remote, but designation would provide flexibility and save a great deal of time and expense in the future. Is it really logical to blame bald eagle shooting deaths on a powerline? Come on now, why not blame the gun or the car?

ISSUE #3, ACCESS:

Page 1-4, Planning Criteria:
Legal access across private lands will be difficult to obtain unless something is done to relieve land owners of liability for injuries or property damage claims that may result from such use.

ISSUE #4. RECREATION:

Page 1-5, Planning Criteria:
Closure to ORV use should be considered to prevent damage to fragile soils and other resources, to prevent harassment of livestock and to prevent interference with other uses.

Page 4-7, first paragraph:
Why would the facilities at Ruby Marsh Campground be less than properly maintained under the no-action alternative? The alternative suggests no reduction in maintenance funds. If the facility is not being properly maintained now, then nothing would change, so there would be no impact, either beneficial or adverse.

Page 4-8, ORV:
The designation of the WSAs as wilderness would be adverse impacts to recreation under all alternatives except no action. Persons depending upon motor vehicles to use these areas would be excluded. This number probably includes nearly 100% of the people now using the areas and those projected to use the areas without wilderness designation.

Page 4-15, Economic Impacts:
The reported economic impact on recreation is based largely on projected decreases in big-game and fisheries habitat. Since the conclusion that these decreases would occur is based on questionable assumptions, there is no real evidence that the

economic impact would be as stated.

ISSUE #5, WILDERNESS:

The recommendation to designate these areas as wilderness is, in our opinion, not the best management action for this issue. The three southern areas are very similar to each other and to other nearby mountain ranges in topographic, vegetative and other characteristics. They are all short of water. They certainly have the capability to provide solitude, but it is not really 'outstanding' when a similar opportunity is available in so many places in northeastern Nevada. Can the recreational opportunities be called outstanding when an area is so dry and is so similar to much of the surrounding country?

1 Two of the areas contain cherry-stemmed roads and all have so-called ways leading to mining claims, wood cutting areas, christmas tree harvest areas and livestock handling facilities. Some of these 'ways' have had occasional maintenance performed to keep them passable. The existence of these features and the habits and needs of the people who created and have used them will make management difficult. The May 1982 issue of the Management Situation Analysis discusses the need to evaluate the closure of the cherry-stemmed roads to improve manageability. If closure is necessary to maintain wilderness qualities, the areas are not roadless in the first place and shouldn't have been considered as potential wilderness.

2 Table 3-11, on page 3-20 shows a calculation of User Day Benefits for recreational usage of the four WSAs under the assumptions of designation and non-designation. How were the visitor day numbers for the existing situation obtained? Access to the Badlands is pretty well limited to crossing occupied private land. How could 500 people have entered this area without having been seen by the land owners? Were these numbers actual counts or were they just based on visitor day estimates made on similar sized areas somewhere else? Why are these numbers so different from those shown in table 3-21, page 104 of the May 1982 issue of the Management Situation Analysis?

If there were 500 people in the Badlands, or 300 people in Bluebell, or 800 in Goshute Peak or 150 in South Pequop during 1981, the majority most likely was there to gather firewood, cut christmas trees, collect pinenuts, hunt deer or carry out some other activity having nothing whatsoever to do with solitude or a wilderness experience. This majority, most likely, used a motor

Comment Letter 16

vehicle to get to where they were going and would not have been there had they not been able to use the motor vehicle. If there were 1,750 recreational visitor days on these 4 areas, how many use days resulted from people working with livestock, prospecting for minerals, or doing something else not qualifying as recreation? The impacts on all the people presently using these areas have not been adequately considered in making this recommendation. 3

We question the accuracy of the estimated number of visitors for the existing situation and must also question the projected numbers. The percentage increase portrayed aren't realistic. Why would the visitation to South Pequop increase 667% while the visitation to Goshute Peak only increase 375%? According to table 3-18 of the MSA, Goshute Peak is larger and offers a more varied selection of 'attractions' than does South Pequop. Visitation to Badlands would increase only 400%, in spite of it's being the most desireable of the four areas.

Assuming these projections are accurate, what would be the impact on the physical environment of injecting 3,000 visitor days into the Goshute Peak area or 2,000 into the Badlands? What would be the effect on wilderness quality itself? That narrow strip of land on each side of Salmon Falls Creek would certainly show the effects of man's presence if you encourage 2,000 people to spend the day there by designating it as wilderness. What would it do to the solitude that now exists and is likely to remain if the area is NOT designated?

Page 3-4, Affected Environment:
The descriptions contained in this document and in the Wilderness Technical report paint a pretty picture of the so-called wilderness qualities of these WSAs while down-playing the value and potential value to other uses. The tone of these documents makes one wonder if they were not developed to sell wilderness, rather than to provide unbiased information for someone else to use in making a decision.

Page 3-10, 3rd paragraph, left column:
This paragraph seems to indicate that the designation or non-designation as wilderness would have an effect on the use of the WSAs by sheep. Nothing I have seen in the Wilderness Act would cause a change in the class of livestock using an area.

ISSUE #6, LIVESTOCK GRAZING:

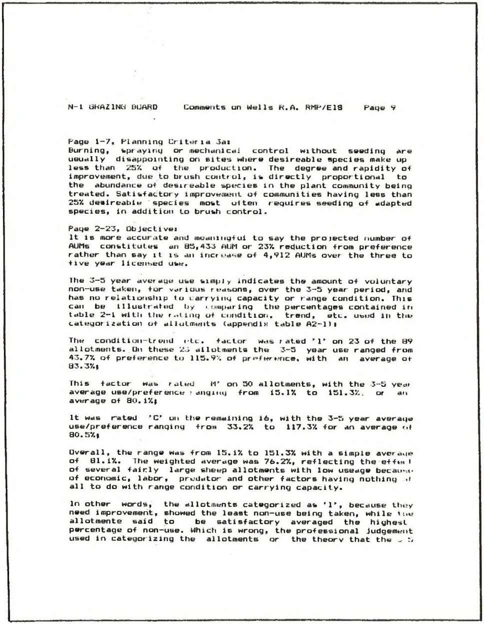
Response Letter 16

RESPONSE TO LETTER 15

1. The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. A way maintained solely by the passage of vehicles does not constritute a road." The Interior Board of Land Appeals (I.B.L.A.) has not reversed this decision. Additionally, the I.B.L.A. has ruled the use of cherrystem roads by the BLM as an acceptable practice in delineating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

2 Visitor day estimates were derived through professional judgment of BLM employees. The best available information (which included inventory work, personal knowledge of the WSAs, and field surveillance) was used to estimate visitor days by WSA.

3 Few individuals use the WSAs to manage livestock and prospect for minerals, as evidenced by the magnitude of these operations in the WSAs. total yearly use for these activities in the WSAs is estimated to be less than 500 visits. The majority of livestock management in the WSAs is either accomplished through nonmotorized methods or takes place on the border roads and cherrystem roads which penetrate the WSAs.



Page 1-7, Planning Criteria 3a:
Burning, spraying or mechanical control without seeding are usually disappointing on sites where desireable species make up less than 25% of the production. The degree and rapidity of improvement, due to brush control, is directly proportional to the abundance of desireable species in the plant community being treated. Satisfactory improvement of communities having less than 25% desireable species most often requires seeding of adapted species, in addition to brush control.

Page 2-23, Objective:
It is more accurate and meaningful to say the projected number of AUMs constitutes an 85,433 AUM or 23% reduction from preference rather than say it is an increase of 4,912 AUMs over the three to five year licensed use.

The 3-5 year average use simply indicates the amount of voluntary non-use taken, for various reasons, over the 3-5 year period, and has no relationship to carrying capacity or range condition. This can be illustrated by comparing the percentages contained in table 2-1 with the rating of condition, trend, etc. used in the categorization of allotments (appendix table A2-1);

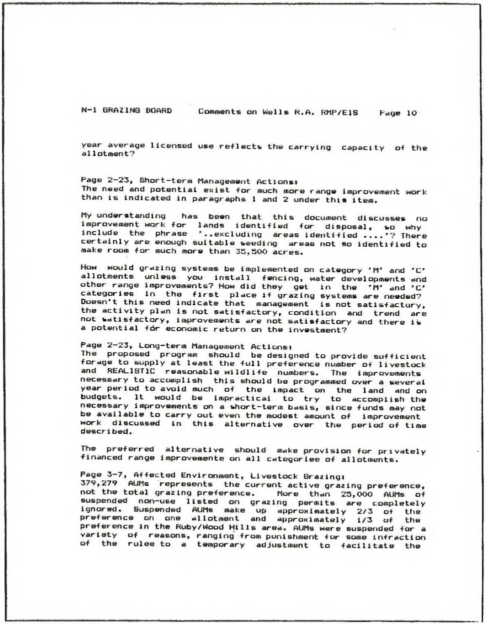
The condition-trend etc. factor was rated 'I' on 23 of the 89 allotments. On these 23 allotments the 3-5 year use ranged from 43.7% of preference to 115.9% of preference, with an average of 83.3%;

This factor was rated 'M' on 50 allotments, with the 3-5 year average use/preference ranging from 15.1% to 151.3%, or an average of 80.1%;

It was rated 'C' on the remaining 16, with the 3-5 year average use/preference ranging from 33.2% to 117.3% for an average of 80.5%;

Overall, the range was from 15.1% to 151.3% with a simple average of 81.1%. The weighted average was 76.2%, reflecting the effect of several fairly large sheep allotments with low useage because of economic, labor, predator and other factors having nothing at all to do with range condition or carrying capacity.

In other words, the allotments categorized as 'I', because they need improvement, showed the least non-use being taken, while the allotmente said to be satisfactory averaged the highest percentage of non-use. Which is wrong, the professional judgement used in categorizing the allotments or the theory that the 3-5



year average licensed use reflects the carrying capacity of the allotment?

Page 2-23, Short-term Management Actions:
The need and potential exist for much more range improvement work than is indicated in paragraphs 1 and 2 under this item.

My understanding has been that this document discusses no improvement work for lands identified for disposal, so why include the phrase '..excluding areas identified ....'? There certainly are enough suitable seeding areas not so identified to make room for much more than 35,500 acres.

How would grazing systems be implemented on category 'M' and 'C' allotments unless you install fencing, water developments and other range improvements? How did they get in the 'M' and 'C' categories in the first place if grazing systems are needed? Doesn't this need indicate that management is not satisfactory, the activity plan is not satisfactory, condition and trend are not satisfactory, improvements are not satisfactory and there is a potential for economic return on the investment?

Page 2-23, Long-term Management Actions:
The proposed program should be designed to provide sufficient forage to supply at least the full preference number of livestock and REALISTIC reasonable wildlife numbers. The improvements necessary to accomplish this should be programmed over a several year period to avoid much of the impact on the land and on budgets. It would be impractical to try to accomplish the necessary improvements on a short-term basis, since funds may not be available to carry out even the modest amount of improvement work discussed in this alternative over the period of time described.

The preferred alternative should make provision for privately financed range improvemente on all categoriee of allotments.

Page 3-7, Affected Environment, Livestock Grazing:
379,279 AUMs represents the current active grazing preference, not the total grazing preference. More than 25,000 AUMs of suspended non-use listed on grazing permits are completely ignored. Suspended AUMs make up approximately 2/3 of the preference on one allotment and approximately 1/3 of the preference in the Ruby/Wood Hills area. AUMs were suspended for a variety of reasons, ranging from punishment for some infraction of the rulee to a temporary adjustment to facilitate the

implementation of a grazing system. Most permittees were apparently told that the AUMs would be restored after a certain date or after certain management objectives were attained. Others were promised range seedings, and/or other improvements to restore suspended AUMs, but these were delayed pending the completion of the EIS.

The number of suspended AUMs is significant in the evaluation of the economic effects of the grazing reductions proposed under the various alternatives and should be shown in the report.

Table 3-2, 'Livestock Grazing Chacteristics':
The data under the column headed 'Net Ranch Income' do not reflect true net income because they do not include two very important items of expense-depreciation and interest on investment. These are significant costs for ranch operations, just as they are for motels, service stations and factories. These costs should be included to avoid the erroneous conclusion that each AUM provides a net return of $18.74. ($5,416,600 divided by 288,934 AUMs)

Tables AS-1 contain some questionable information that could significantly effect the economic computations:
The prices used in calculating the total value of livestock production are out of line on today's market and probably are considerably higher than the average received by ranchers during the 1978-1980 period.

Calving percentages and sale weights are usually significantly lower than average on the very large operations because the owner or manager cannot pay as much personal attention to the details of good animal husbandry. This report shows these figures and other operational parameters to be the same for all four herd sizes analyzed.

All four tables show the same calf crop percentage, loss percentages, replacement rate, cow/bull ratio, sale weight and price per pound. Why then, is the production value per cow so much lower for the less than 200 head operation than it is for the other three? Rounding would account for some of the variation, but certainly not 16% and more.

The grazing fee costs stated are not consistent with the percent federal land forage dependency listed in the foot notes for the various herd sizes. For example, there is no real reason why, for the 0-199 cow operation, grazing fees for a National Forest permit providing 1% of the year's forage should cost $10.06/cow

while a BLM permit providing 30% of the year's forage costs $12.31.

The 21% of a year or 2.5 month feeding period is not long enough for Elko County conditions. A more realistic 3 month period would increase hay and protein supplement costs by about 20%.

The total labor cost per cow (family labor plus hired labor) shows a rather unusual variation between the four different size operations. The 0-199 and the 500-999 head units both require about $42 per cow, the 200-499 head unit requires $69 per cow and the 1000 plus unit requires about $26 per cow. It is difficult to understand why the 200-499 head operation reguires 65% more hired labor per cow than does the 500 to 999 head operation and at the same time utilizes 65% more family labor than does the larger unit. One would certainly think the results of this amount of labor would be evidenced in increased calf crop, heavier weights or some other factor

Probably none of the above flaws is fatal by itself, but if these and others I have not listed were corrected, the result of the economic analyses might look much differently.

Page 3-25. Condition:

This is the first EIS I have seen acknowledge that the present vegetative condition is a result of past, rather than present, grazing practices. This paragraph also indicates that some improvement is taking place under existing use. Congratulations!

Page 3-2, Condition, 2nd paragraph:
The third sentence of this paragraph indicates that trend studies will be finalized when soils information becomes available. The monitoring of trend should be a permanent part of the management of rangelands and should never be 'finalized'. Properly interpreted soils information is useful in selecting and evaluating locations for monitoring studies and in establishing realistic goals and objectives for management. but play very little part in actual trend analyses.

Table 3-12 contains some rather obvious errors in the lists of species associated with the various types. Example: Idaho fescue is missing from the Sagebrush-Rabbitbrush and the Mountain s[illegible] types and should definitely NOT be listed in the Saltbush 'vo

Page 4-3, Livestock Grazing, assumption #1:
This assumption indicates that monitoring will be discontinued

after sufficient information has been obtained to make grazing level adjustments. The word 'completed' should be eliminated to avoid this interpretation.

Page 4-15, Economic Impact, Livestock Grazing:
This paragraph states that the no action alternative would have no impact on the ranching economy. Why then does table A5-2 show a negative economic effect when compared with the existing situation and table S-2 show an increase in the market value of AUMs under the no action alternative?

Page 4-16, Social Impacts, Livestock grazing:
The statement that the no-action alternative would not be the rancher's first choice is questionable. The no-action alternative would not preclude the installation of necessary range improvements.

Page 4-21, Livestock grazing:
The projected overall increases in AUMs would not be distributed among allotments within an RCA in accordance with their need for improvement. Example: Spruce-Goshutes has 14 allotments, all of which used less than active preference over the past 3-5 years, according to table 2-1. Only 3 of these are in category 'I', so only 3 could be improved and receive a portion of the 70,000 AUM increase projected for this RCA. Of the 89 allotments, 56 used less than the permit, but only 25 were placed in category 'I'.

As written, the Resource Production alternative could not possibly result in seedings which would be located properly to 'provide for the spring forage needs of current livestock numbers

and the majority of the requirements for additional livestock numbers'. Improving 25 allotments just would not get this job done.

Page 4-21, 2.Native range...:
Over the long-term, proper grazing management should result in AT LEAST a one condition class improvement on areas of native vegetation that are presently in fair or better conditon. Table A2-2 shows that only about 20% of the R.A. is in poor condition. Therefore, if just the category 'I' allotments are treated, the improvement in condition on at least some of the RCAs should far exceed the threshold of significance. You are overlooking the fact that vegetative trend will be monitored on all allotments and appropriate adjustments made under this alternative.

Page 4-21, No added costs...:

This is a questionable determination. The possibility that BLM may someday close the cherry-stemmed roads because they interfere with the wilderness character was discussed in the MSA and therefore should be considered in determining the impact.

Page 4-22, Loss of livestock grazing...:
The loss of forage is not the major adverse impact that would result from fencing riparian areas:

1.Fencing proposals exist on allotments having existing, properly functioning grazing systems. The insertion of fenced strips may cut the fields into such small segments as tu interfere with the functioning of the system;

2.Fencing will interrupt the customary movement of livestock from one part of the range to another, and may cause isolated unutilized areas;

3.Fencing may cut off accustomed sources of stock water and adversely effect livestock performance and utilization patterns. Streams are especially valuable as water sources because they require no maintenance and can be depended upon to not fail unexpectedly except under unusual circumstances. The provision of water gaps is a less than satisfactory solution because of destructive erosion and increased fence maintenance due to crowding of livestock where water gaps are too narrow;

4.Fencing along sidehills may create traps which can cause death loss or injury to both livestock and wildlife;

5.Locating fences to avoid the impact stated in 4 could cause many more than 1,610 acres to be eliminated from grazing under this alternative;

6.Fence maintenance will be a problem. Part of the sales pitch so far has been that BLM will maintain the fences. This could change at any time, resulting in either the requirement that the permittee maintain the fence or abandonment which would in time result in down wire strung out across the landscape. Trespass will undoubtedly result from improper or no maintenance, or from poor fence location or construction. Many ranchers are hard-pressed to maintain the improvements they have now, let alone fences which are going to be of no importance to their operation.

The order in which the above impacts are listed has no bearing on their importance. Some of the above impacts could be avoided by proper planning of all the resource needs on an allotment prior to the implementation of any major changes or improvements.

Page 4-33, paragraph beginning at bottom of left hand column:
Vegetative improvement under the resource production alternative shoold be at least as great as is shown here because of the more intensive management proposed onder that alternative.

Page 4-39, Livestock grazing:
If no increase in AUMs is projected, why this exercise? How can a 3.5% increase in sales result in an 11.1% decrease in net income while a 2.1% sales increase results in a 16.1% increased income?

Page 4-41, Livestock grazing:
All of the alternatives depend upon monitoring of vegetation to determine if management adjustments need to be made. If monitoring is done realistically, cooperatively and fairly, there is no reason to believe that ranchers will be 'dismayed' at the results.

Page 4-45, Native range .....:
The many long term exclosures located throughout northern Nevada indicate that complete exclusion of livestock does not necessarily result in improved native range condition.

ISSUE #7, WILDHORSES:

Page 4-45, Wildhorse numbers:
What on earth woold be the rationale for allowing wildhorse numbers to increase by 100% in the Protection alternative? This is an unmanaged, 12 months of the year use. The impacts of this destructive use are not addressed.

ISSUE #8, TERRESTRIAL WILDLIFE HABITAT:

Page 2-24, Short-term management actions:
The practices anticipated to manage the proposed ACEC should be specified.

Page 2-24, Short & long-term management actions:
The actions anticipated to improve habitats for the reintroduction of 'native' species should be specified so environmental and other effects can be identified.

The actions anticipated to manage the non-aquatic aspen and

mountain mahogany habitats should be specified so environmental and other effects can be identified.

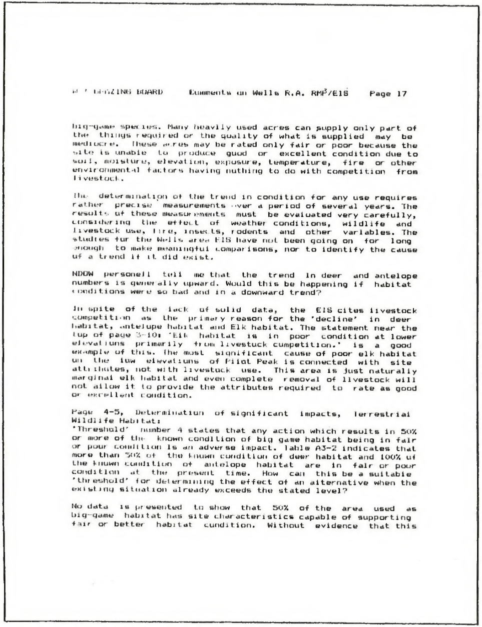
What woold be seeded in the 5,500 acre project(s) for big-game? Would this (these) project(s) also benefit livestock? If not, how would it (they) be protected from livestock ose? I coold find no mention of the environmental or other effect of this action.

The actions anticipated to improve the 50,000 acres of crucial deer winter habitat should be specified so the environmental and other effects can be identified.

Page 3-9, Big Game Populations and Habitat Condition:
Appendix table A3-1 is said to contain reasonable and existing big-game numbers provided by the Nevada Department of Wildlife in 1977 and 1978. A comparison between the numbers contained in this table and copies of the NDOW information, obtained from BLM biologists in 1980, indicates that some mistake in tabulation must have been made. For Mule Deer, table A3-1 shows a reasonable number of 73,700 while the NDOW information indicates a peak month reasonable number of 54,000. The NDOW number includes deer using National Forest Lands, private lands and BLM lands outside of the Wells Resource Area. The maximum reasonable number projected for BLM lands within the Wells Resoorce Area would be 31,000 head on the first day of March. The minimom number projected for Wells R.A. BLM lands was 15,000 head for a five month period, Jone through October. Note that the above numbers for BLM lands still include deer that would use a significant acreage of privately owned lands, much of which comprises the better deer habitat. Also note that the peak 'reasonable' number obtained from the NDOW sheets is not very much higher than the 'existing' number reported in the EIS. A similar discrepency exists in the antelope numbers.

Wildlife habitat condition was determined by numerically rating several existing habitat features against a specific optimum condition for those features, then totaling the ratings to obtain percent of optimum. This method of evaluation does not take into consideration the capability of the site to produce the desired characteristics. It is based soley on whether or not the desired attributes are present or absent.

Obviously, not every one of the 4.5 million acres of BLM lands in the Wells R.A. has the capability to provide all the attributes it takes to rate as good or excellent deer, antelope, elk or bighorn habitat. Many acres in this area are not used at all by



big-game species. Many heavily used acres can supply only part of the things required or the quality of what is supplied may be mediocre. These acres may be rated only fair or poor because the site is unable to produce good or excellent condition due to soil, moisture, elevation, exposure, temperature, fire or other environmental factors having nothing to do with competition from livestock.

The determination of the trend in condition for any use requires rather precise measurements over a period of several years. The results of these measurements must be evaluated very carefully, considering the effect of weather conditions, wildlife and livestock use, fire, insects, rodents and other variables. The studies for the Wells area EIS have not been going on for long enough to make meaningful comparisons, nor to identify the cause of a trend if it did exist.

NDOW personell tell me that the trend in deer and antelope numbers is generally upward. Would this be happening if habitat conditions were so bad and in a downward trend?

In spite of the lack of solid data, the EIS cites livestock competition as the primary reason for the 'decline' in deer habitat, antelope habitat and Elk habitat. The statement near the top of page 3-10: 'Elk habitat is in poor condition at lower elevations primarily from livestock competition.' is a good example of this. The most significant cause of poor elk habitat on the low elevations of Pilot Peak is connected with site attributes, not with livestock use. This area is just naturally marginal elk habitat and even complete removal of livestock will not allow it to provide the attributes required to rate as good or excellent condition.

Page 4-5, Determination of significant impacts, Terrestrial Wildlife Habitat:
'Threshold' number 4 states that any action which results in 50% or more of the known condition of big game habitat being in fair or poor condition is an adverse impact. Table A3-2 indicates that more than 50% of the known condition of deer habitat and 100% of the known condition of antelope habitat are in fair or poor condition at the present time. How can this be a suitable 'threshold' for determining the effect of an alternative when the existing situation already exceeds the stated level?

No data is presented to show that 50% of the area used as big-game habitat has site characteristics capable of supporting fair or better habitat condition. Without evidence that this

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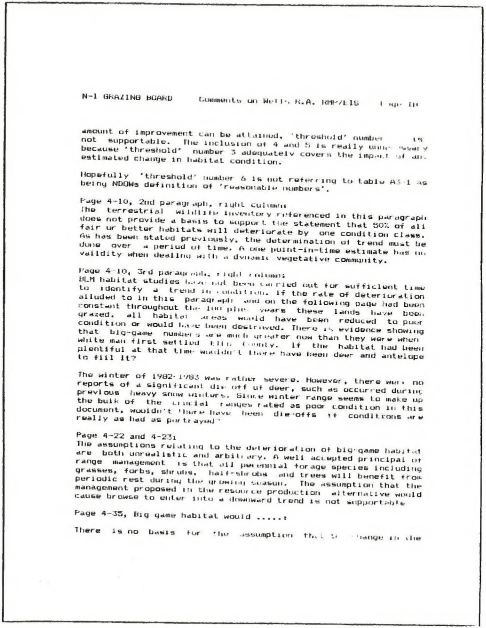

amount of improvement can be attained, 'threshold' number is not supportable. The inclusion of 4 and 5 is really unnecessary because 'threshold' number 3 adequately covers the impact of an estimated change in habitat condition.

Hopefully 'threshold' number 6 is not referring to table A3-1 as being NDOWs definition of 'reasonable numbers'.

Page 4-10, 2nd paragraph, right column:
The terrestrial wildlife inventory referenced in this paragraph does not provide a basis to support the statement that 50% of all fair or better habitats will deteriorate by one condition class. As has been stated previously, the determination of trend must be done over a period of time. A one point-in-time estimate has no validity when dealing with a dynamic vegetative community.

Page 4-10, 3rd paragraph, right column:
BLM habitat studies have not been carried out for sufficient time to identify a trend in condition. If the rate of deterioration alluded to in this paragraph and on the following page had been constant throughout the 100 plus years these lands have been grazed, all habitat areas would have been reduced to poor condition or would have been destroyed. There is evidence showing that big-game numbers are much greater now than they were when white man first settled Elko County. If the habitat had been plentiful at that time wouldn't there have been deer and antelope to fill it?

The winter of 1982-1983 was rather severe. However, there were no reports of a significant die off of deer, such as occurred during previous heavy snow winters. Since winter range seems to make up the bulk of the crucial ranges rated as poor condition in this document, wouldn't there have been die-offs if conditions are really as bad as portrayed?

Page 4-22 and 4-23:
The assumptions relating to the deterioration of big-game habitat are both unrealistic and arbitrary. A well accepted principal of range management is that all perennial forage species including grasses, forbs, shrubs, half-shrubs and trees will benefit from periodic rest during the growing season. The assumption that the management proposed in the resource production alternative would cause browse to enter into a downward trend is not supportable.

Page 4-35, Big game habitat would .....:

There is no basis for the assumption that a change in the condition of big-game habitat would be any different for this alternative than for the resource production alternative. The basic difference between the two alternatives is stocking rate and the amount of range seeding proposed. Livestock stocking rate has much less effect upon vegetative condition than does season and frequency of use, kind of management system and other factors.

ISSUE #9, RIPARIAN/STREAM HABITAT:

Page 2-25, Objective:
The worthy objective of improving these habitats to good or better condition may not be physically attainable because the site may not have the characteristics necessary to support the attributes required in good or better condition. For example, a fisheries habitat study was done on the upper Mary's River by the Forest Service and NDOW, using essentially the same criteria as is used by BLM. One section in the upper reaches was rated fair condition with a remark to the effect that the site was essentially pristine, with little or no evidence of livestock related influences. Obviously, the site did not have the potential for any better condition. Quite conceivably this is not a unique circumstance.

Page 3-11, Riparian/stream habitat:
The procedure used to evaluate fisheries habitat is explained in several of the paragraphs on the left side of page 3-12. The fifth full paragraph on this page discusses the primary rating factors and the number of streams where these factors were in poor or fair condition.

These five factors, as well as the 'Priority B' factors, are all effected to some degree by one or more of the following: gradient of the stream bed; soils and soil parent material on the watershed and in the area of the stream channel; magnitude of the peak and minimum water flows and the relationship between the annual high and low flows; geologic conditions and events; other environmental factors; and man caused disturbances.

On most streams, the things that man cannot control have more influence on some of the rating factors than do the things he can control. The gradient of the stream bed, for example, controls the velocity of the water, which in turn effects: the kind of material on the stream bed; the ratio of riffles to pools; the width of the channel in relation to water depth; the quality of pools; the stability of stream banks; and in some cases the kind

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of vegetation along the stream. The degree to which gradient will effect these factors is in turn dependent upon hydrologic, geologic, soils and other topographic conditions.

Because of the complex relationships involved, persons familiar with all of these sciences should be included on the team charged with trying to determine the reason a stream is in a particular condition and how much potential it has to reach a better condition. The joint stream inventories, referred to on the 3rd paragraph on page 3-12, were not made by such a team. The conclusion that a stream is in deteriorated condition due to livestock grazing (p 3-14, 3rd par.) may therefore be erroneous in more cases than it is right. Because each stream segment is unique and different, the success or failure of a certain treatment on a few selected stream reaches will not necessarily mean that all other streams will, or will not, have a similar response to that treatment.

Page 4-5, Determination of significant impacts, Riparian/stream habitat:
As previously stated in these comments, not all riparian/stream habitats are located on sites capable of supporting good or better condition. Until condition is defined as being in relationship to the potential for the site, a threshold of good or better condition is unrealistic.

Page 4-17, Riparian/stream habitat:
The phrase 'subtle changes in riparian condition' bears out the previous comment that only long-term studies and investigation by an interdisciplinary team can determine the actual trend and condition of these areas.

The purpose for this EIS is to disclose the environmental effects that would result from the implementation of the five RMP alternatives. Since the RMP properly does not propose any treatment on privately owned land, the EIS should not include private acres and miles of stream when discussing the various kinds of wildlife habitat. The range people were able to seperate the BLM administered lands from the privately owned lands when listing range types and estimating ecological condition. It should have been easier for the wildlife people because they are talking about fewer acres.

Including private property adds emphasis to the point the biologists are trying to sell, but the condition and trend of privately owned habitat (particularly fenced lands) is of absolutely no importance to the determination of the impacts of the treatment of public lands. It is no more the concern of BLM that privately owned stream segments might be deteriorating or improving than it is that the private lands might be eroded as a result of irrigating the hay needed to winter the cows that graze BLM lands. There are other agencies and other programs charged with working with land owners to evaluate and solve problems on private land.

Respectfully submitted,

Lester A. McKenzie

Lester A. McKenzie
Certified Range Management Consultant

SIXTH ALTERNATIVE
Wells Resource Area Resource Management Plan

This alternative, being proposed by the Nevada Grazing Board for District N-1, is multiple use oriented, stressing a workable approach to resource management in the Wells Resource Area. Units of various practices and issues have not been quantified in most cases, because these numbers should remain flexible to permit appropriate adjustments to be made.

OBJECTIVE/MANAGEMENT ACTIONS

ISSUE 1: LANDS

Objective: (Same as preferred alternative)

Short and Long-Term Management Actions:

1.Dispose of 93,150 acres, including community expansion lands, primarily through public sale.

2.Expedite land exchanges for the purpose of blocking up ownerships to permit more efficient management of both public and private lands.

ISSUE 2: CORRIDORS

Objectives: (Same as no-action)

Short and Long-Term Management Actions: Designate reasonable width transportation and utility corridors along existing rights-of-way. Require use of these corridors for future developments wherever feasible. New corridors will be considered for designation on the basis of economic justification, proximity to existing corridors and complete environmental studies of alternate routes.

ISSUE 3: ACCESS

Objective: To acquire legal access for routes necessary for

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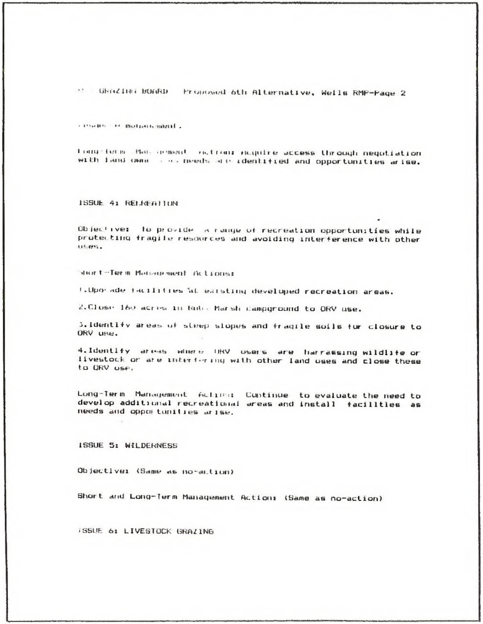

N-1 GRAZING BOARD Proposed 6th Alternative, Wells RMP-Page 2

[illegible] management.

Long-Term Management Action: Acquire access through negotiation with land owners as needs are identified and opportunities arise.

ISSUE 4: RECREATION

Objective: To provide a range of recreation opportunities while protecting fragile resources and avoiding interference with other uses.

Short-Term Management Actions:

1.Upgrade facilities at existing developed recreation areas.

2.Close 160 acres in [illegible] Marsh Campground to ORV use.

3.Identify areas of steep slopes and fragile soils for closure to ORV use.

4.Identify areas where ORV users are harrassing wildlife or livestock or are interfering with other land uses and close these to ORV use.

Long-Term Management Action: Continue to evaluate the need to develop additional recreational areas and install facilities as needs and opportunities arise.

ISSUE 5: WILDERNESS

Objective: (Same as no-action)

Short and Long-Term Management Action: (Same as no-action)

ISSUE 6: LIVESTOCK GRAZING

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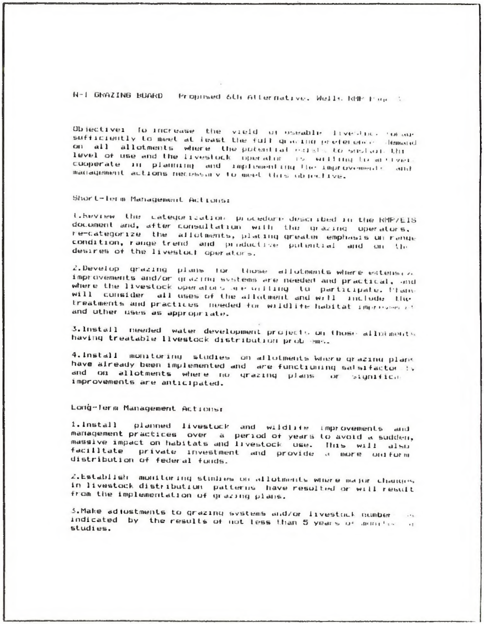

N-1 GRAZING BOARD Proposed 6th Alternative, Wells RMP-Page 3

Objective: To increase the yield of useable livestock forage sufficiently to meet at least the full grazing preference demand on all allotments where the potential exists to sustain the level of use and the livestock operator is willing to actively cooperate in planning and implementing the improvements and management actions necessary to meet this objective.

Short-Term Management Actions:

1.Review the categorization procedure described in the RMP/EIS document and, after consultation with the grazing operators, re-categorize the allotments, placing greater emphasis on range condition, range trend and productive potential and on the desires of the livestock operators.

2.Develop grazing plans for those allotments where extensive improvements and/or grazing systems are needed and practical, and where the livestock operators are willing to participate. Plans will consider all uses of the allotment and will include the treatments and practices needed for wildlife habitat improvement and other uses as appropriate.

3.Install needed water development projects on those allotments having treatable livestock distribution problems.

4.Install monitoring studies on allotments where grazing plans have already been implemented and are functioning satisfactorily and on allotments where no grazing plans or significant improvements are anticipated.

Long-Term Management Actions:

1.Install planned livestock and wildlife improvements and management practices over a period of years to avoid a sudden, massive impact on habitats and livestock use. This will also facilitate private investment and provide a more uniform distribution of federal funds.

2.Establish monitoring studies on allotments where major changes in livestock distribution patterns have resulted or will result from the implementation of grazing plans.

3.Make adjustments to grazing systems and/or livestock number as indicated by the results of not less than 5 years of monitoring studies.

ISSUE 7: WILDHORSES

Objective: To manage wildhorse herds in accordance with the mandates of law and the need to protect the resources.

Short and Long-Term Management Actions:

1.Continue to monitor wildhorse populations and habitat conditions.

2.Conduct wildhorse gatherings as necessary to reduce and maintain the total number of horses in the resource area at the 1971 number of approximately 320 head.

3.Remove wildhorses from areas where they did not occur in 1971 and from private lands if requested.

ISSUE 8: TERRESTRIAL WILDLIFE HABITAT

Objective: To enhance wildlife habitat conditions through improved livestock management, multiple use range improvements and specific habitat improvement practices.

Short and Long-Term Management Actions:

1.Modify hazardous sections of fence, located across major migration routes, to meet standards for the species of wildlife utilizing the area.

2.Maintain existing wildlife projects.

3.Work with users to develop suitable remedies in cases where monitoring shows a downward trend in the condition of crucial wildlife habitat to be resulting from other resource uses.

4.Plan and carry out multiple use projects for wildlife habitat improvement, livestock forage production and woodland management on crucial deer winter ranges.

ISSUE 9: RIPARIAN/STREAM HABITAT

Objective: To develop a recognition of the value of riparian/stream habitats and initiate a program to improve these

habitats to a condition consistent with their potential and other resource uses.

Short-Term Management Action: Plans on allotments containing high and medium priority riparian/stream habitat systems will include provision for the improvement and or maintenance of these areas, using methods agreed to by all users of the allotment.

Long-Term Management Action: Work with users to develop suitable remedies in cases where monitoring shows a downward trend in the condition of riparian habitats to be resulting from other resource uses.

ISSUE 10: WOODLAND PRODUCTS

Objective: (Same as Preferred Alternative)

Short and Long-Term Management Actions:

1.Implement the necessary management actions to assure that Christmas tree and fence post cutting and fuelwood harvesting are done on a sustained yield basis.

2.Manage salvage cuts for both the general public and commercial users on areas where pinyon-juniper conversions for wildlife or livestock forage enhancement would occur.

IMPLEMENTATION

Selective Management Criteria for Livestock Grazing-(Page 2-27)

Category M Allotment Characteristics
Revise 4 to read-"The land ownership objective is to retain these lands in public ownership or to exchange them for other land to facilitate management.'

Revise 7 to read-'The current ecological range condition is satisfactory.'

Add '8.The trend in ecological range condition is up or not apparent.'

Add '9.The potential for vegetative production is moderate to

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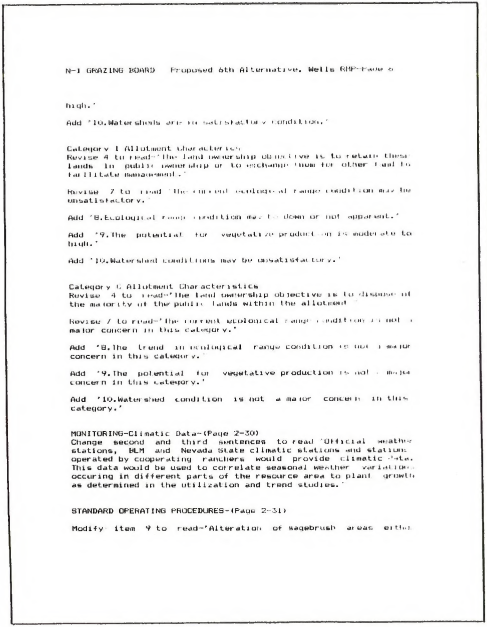

N-1 GRAZING BOARD   Proposed 6th Alternative, Wells RMP-Page 6

high.'

Add '10.Watersheds are in satisfactory condition.'

Category I Allotment Characteristics
Revise 4 to read-'The land ownership objective is to retain these lands in public ownership or to exchange them for other land to facilitate management.'

Revise 7 to read 'The current ecological range condition may be unsatisfactory.'

Add '8.Ecological range condition may be down or not apparent.'

Add '9.The potential for vegetative production is moderate to high.'

Add '10.Watershed conditions may be unsatisfactory.'

Category C Allotment Characteristics
Revise 4 to read-'The land ownership objective is to dispose of the majority of the public lands within the allotment.'

Revise 7 to read-'The current ecological range condition is not a major concern in this category.'

Add '8.The trend in ecological range condition is not a major concern in this category.'

Add '9.The potential for vegetative production is not a major concern in this category.'

Add '10.Watershed condition is not a major concern in this category.'

MONITORING-Climatic Data-(Page 2-30)
Change second and third sentences to read 'Official weather stations, BLM and Nevada State climatic stations and stations operated by cooperating ranchers would provide climatic data. This data would be used to correlate seasonal weather variations occuring in different parts of the resource area to plant growth as determined in the utilization and trend studies.'

STANDARD OPERATING PROCEDURES-(Page 2-31)

Modify item 9 to read-'Alteration of sagebrush areas either

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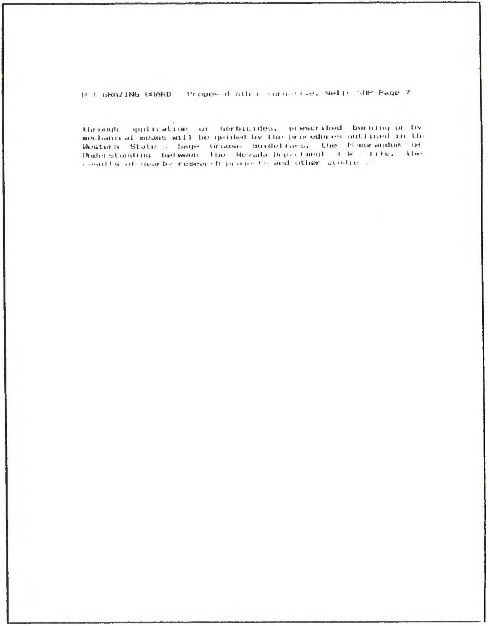

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through application of herbicides, prescribed burning or by mechanical means will be guided by the procedures outlined in the Western States Sage Grouse Guidelines, the Memorandum of Understanding between the Nevada Department of Wildlife, the results of nearby research projects and other studies.'

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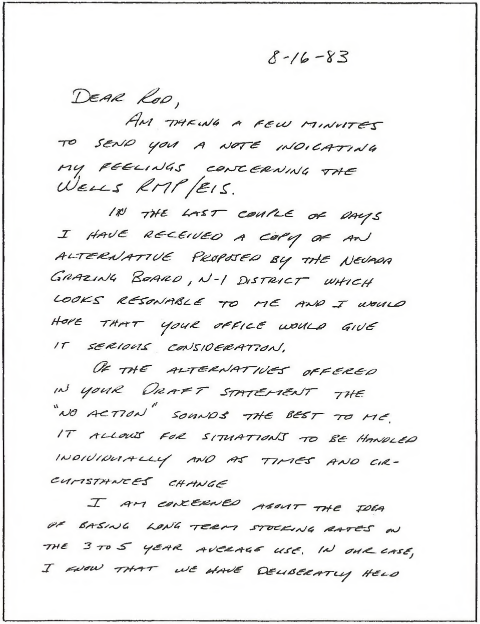

8-16-83

Dear Rod,

Am taking a few minutes to send you a note indicating my feelings concerning the Wells RMP/EIS.

In the last couple of days I have received a copy of an alternative proposed by the Nevada Grazing Board, N-1 District which looks resonable to me and I would hope that your office would give it serious consideration.

Of the alternatives offered in your Draft Statement the "No Action" sounds the best to me. It allows for situations to be handled individually and as times and circumstances change

I am concerned about the idea of basing long term stocking rates on the 3 to 5 year average use. In our case, I know that we have deliberately held

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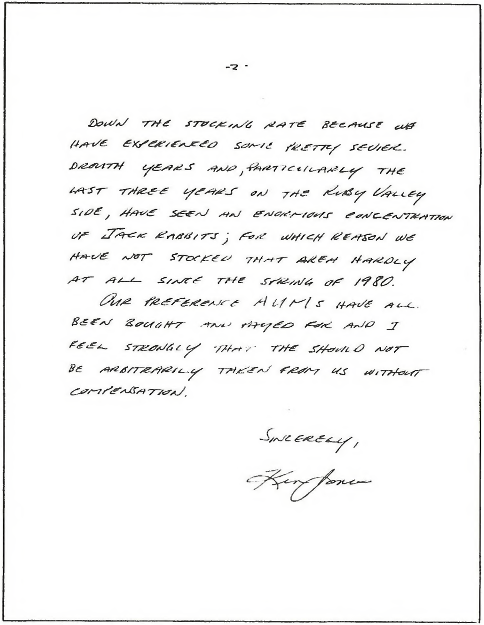

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down the stocking rate because we have experienced some pretty sevier drouth years and, particularly the last three years on the Ruby Valley side, have seen an enormous concentration of Jack Rabbits; for which reason we have not stocked that area hardly at all since the spring of 1980.

Our preference AUM's have all been bought and payed for and I feel strongly that the should not be arbitrarily taken from us without compensation.

Sincerely,

Ken Jones

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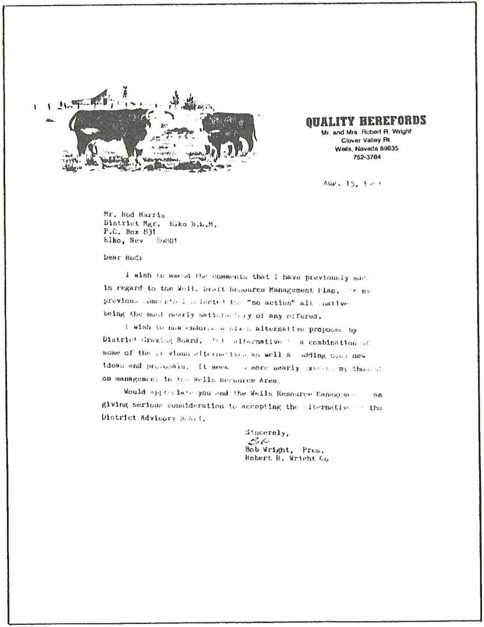

QUALITY HEREFORDS
Mr. and Mrs. Robert R. Wright
Clover Valley Rt.
Wells, Nevada 89835
752-3784

Aug. 15, [illegible]

Mr. Rod Harris
District Mgr. Elko B.L.M.
P.O. Box 831
Elko, Nev 89801

Dear Rod:

I wish to amend the comments that I have previously made in regard to the Wells Draft Resource Management Plan. In my previous comments I selected the "no action" alternative being the most nearly satisfactory of any offered.

I wish to now endorse a sixth alternative proposed by District Grazing Board. This alternative is a combination of some of the previous alternatives as well as adding some new ideas and proposals. It seems to more nearly express my thoughts on management in the Wells Resource Area.

Would appreciate you and the Wells Resource Management Team giving serious consideration to accepting the alternative of the District Advisory Board.

Sincerely,
Bob
Bob Wright, Pres.
Robert R. Wright Co.

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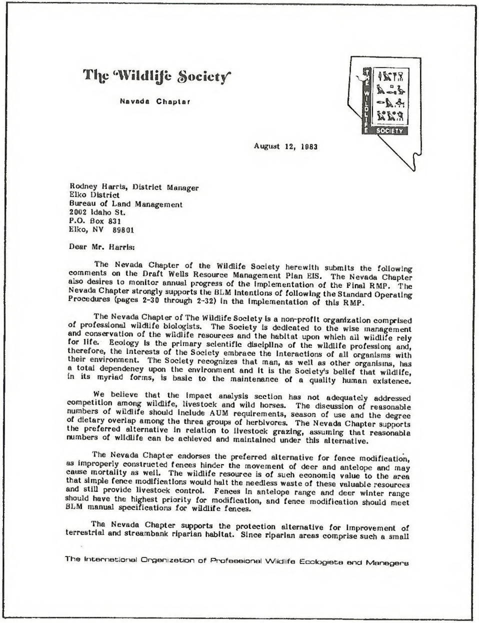

The Wildlife Society
Nevada Chapter

August 12, 1983

Rodney Harris, District Manager
Elko District
Bureau of Land Management
2002 Idaho St.
P.O. Box 831
Elko, NV 89801

Dear Mr. Harris:

The Nevada Chapter of the Wildlife Society herewith submits the following comments on the Draft Wells Resource Management Plan EIS. The Nevada Chapter also desires to monitor annual progress of the implementation of the Final RMP. The Nevada Chapter strongly supports the BLM intentions of following the Standard Operating Procedures (pages 2-30 through 2-32) in the implementation of this RMP.

The Nevada Chapter of The Wildlife Society is a non-profit organization comprised of professional wildlife biologists. The Society is dedicated to the wise management and conservation of the wildlife resources and the habitat upon which all wildlife rely for life. Ecology is the primary scientific discipline of the wildlife profession; and, therefore, the interests of the Society embrace the interactions of all organisms with their environment. The Society recognizes that man, as well as other organisms, has a total dependency upon the environment and it is the Society's belief that wildlife, in its myriad forms, is basic to the maintenance of a quality human existence.

We believe that the impact analysis section has not adequately addressed competition among wildlife, livestock and wild horses. The discussion of reasonable numbers of wildlife should include AUM requirements, season of use and the degree of dietary overlap among the three groups of herbivores. The Nevada Chapter supports the preferred alternative in relation to livestock grazing, assuming that reasonable numbers of wildlife can be achieved and maintained under this alternative.

The Nevada Chapter endorses the preferred alternative for fence modification, as improperly constructed fences hinder the movement of deer and antelope and may cause mortality as well. The wildlife resource is of such economic value to the area that simple fence modifications would halt the needless waste of these valuable resources and still provide livestock control. Fences in antelope range and deer winter range should have the highest priority for modification, and fence modification should meet BLM manual specifications for wildlife fences.

The Nevada Chapter supports the protection alternative for improvement of terrestrial and streambank riparian habitat. Since riparian areas comprise such a small

The International Organization of Professional Wildlife Ecologists and Managers

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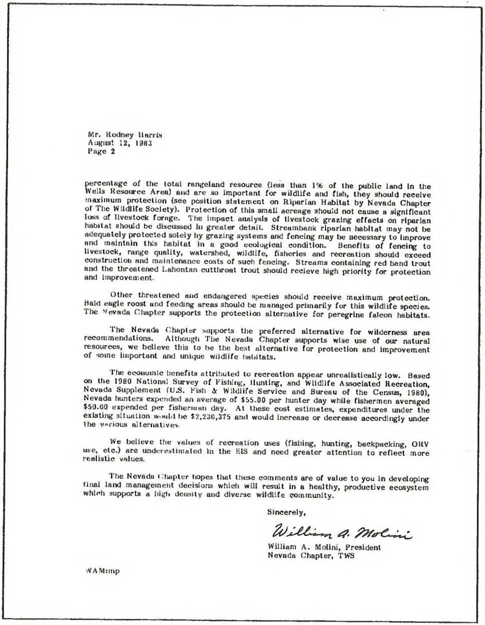


Mr. Rodney Harris
August 12, 1983
Page 2

percentage of the total rangeland resource (less than 1% of the public land in the Wells Resource Area) and are so important for wildlife and fish, they should receive maximum protection (see position statement on Riparian Habitat by Nevada Chapter of The Wildlife Society). Protection of this small acreage should not cause a significant loss of livestock forage. The impact analysis of livestock grazing effects on riparian habitat should be discussed in greater detail. Streambank riparian habitat may not be adequately protected solely by grazing systems and fencing may be necessary to improve and maintain this habitat in a good ecological condition. Benefits of fencing to livestock, range quality, watershed, wildlife, fisheries and recreation should exceed construction and maintenance costs of such fencing. Streams containing red band trout and the threatened Lahontan cutthroat trout should recieve high priority for protection and improvement.

Other threatened and endangered species should receive maximum protection. Bald eagle roost and feeding areas should be managed primarily for this wildlife species. The Nevada Chapter supports the protection alternative for peregrine falcon habitats.

The Nevada Chapter supports the preferred alternative for wilderness area recommendations. Although The Nevada Chapter supports wise use of our natural resources, we believe this to be the best alternative for protection and improvement of some important and unique wildlife habitats.

The economic benefits attributed to recreation appear unrealistically low. Based on the 1980 National Survey of Fishing, Hunting, and Wildlife Associated Recreation, Nevada Supplement (U.S. Fish & Wildlife Service and Bureau of the Census, 1980), Nevada hunters expended an average of $55.00 per hunter day while fishermen averaged $50.00 expended per fisherman day. At these cost estimates, expenditures under the existing situation would be $2,230,375 and would increase or decrease accordingly under the various alternatives.

We believe the values of recreation uses (fishing, hunting, backpacking, ORV use, etc.) are underestimated in the EIS and need greater attention to reflect more realistic values.

The Nevada Chapter hopes that these comments are of value to you in developing final land management decisions which will result in a healthy, productive ecosystem which supports a high density and diverse wildlife community.

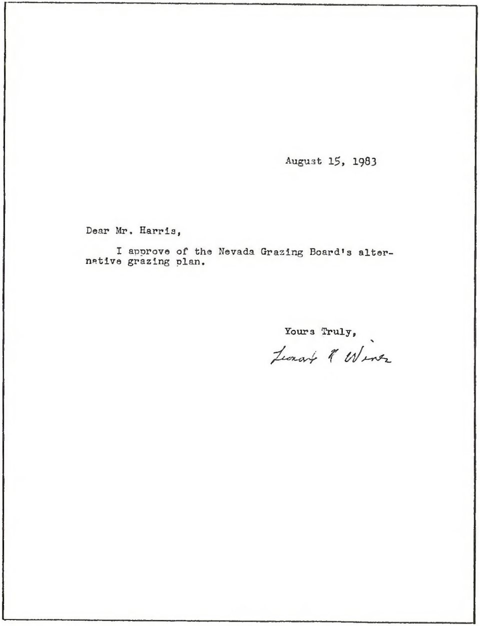
Sincerely,

William A. Molini

William A. Molini, President
Nevada Chapter, TWS

WAM:mp

Comment Letter 20



August 15, 1983

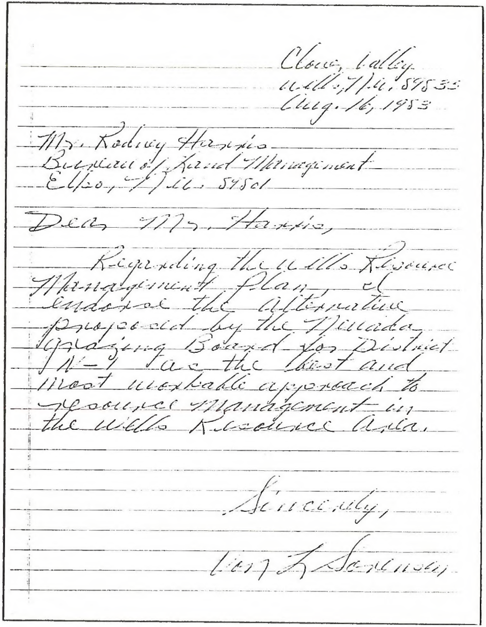
Dear Mr. Harris,

I approve of the Nevada Grazing Board's alternative grazing plan.

Yours Truly,

Leonard R Wines

Comment Letter 21



Clover Valley
Wells, Nev. 89835
Aug. 16, 1983

Mr. Rodney Harris
Bureau of Land Management
Elko, Nev. 89801

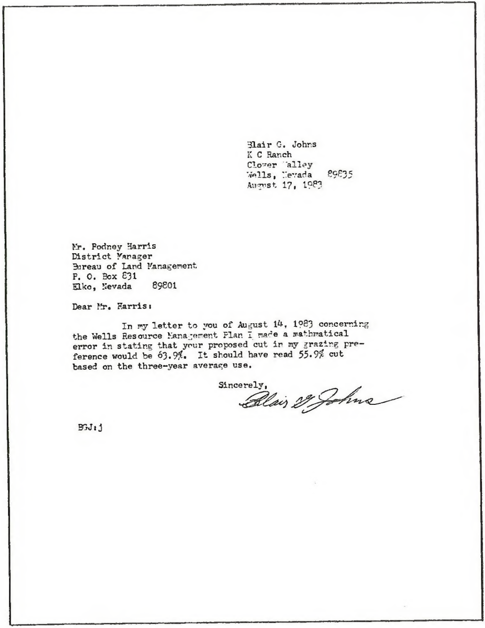
Dear Mr. Harris,

Regarding the Wells Resource Management Plan, I endorse the Alternative proposed by the Nevada Grazing Board for District N-1 as the best and most workable approach to resource management in the Wells Resource Area.

Sincerely,

Lin L Sorenson

Comment Letter 22



Blair G. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835
August 17, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

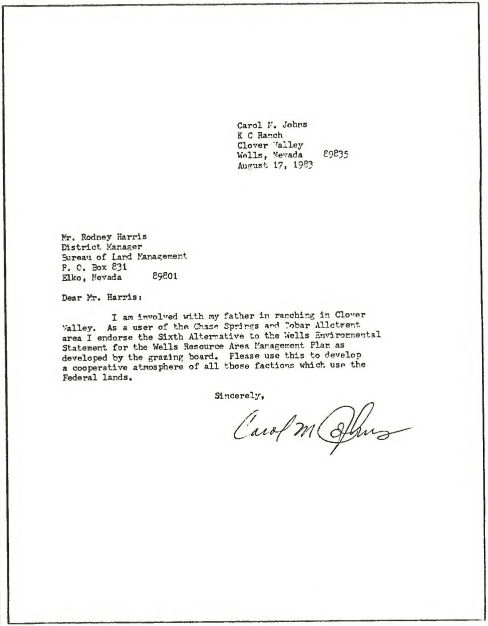
In my letter to you of August 14, 1983 concerning the Wells Resource Management Plan I made a mathmatical error in stating that your proposed cut in my grazing preference would be 63.9%. It should have read 55.9% cut based on the three-year average use.

Sincerely,

Blair G. Johns

BGJ:j

Comment Letter 23



Carol M. Johns
K C Ranch
Clover Valley
Wells, Nevada 89835
August 17, 1983

Mr. Rodney Harris
District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

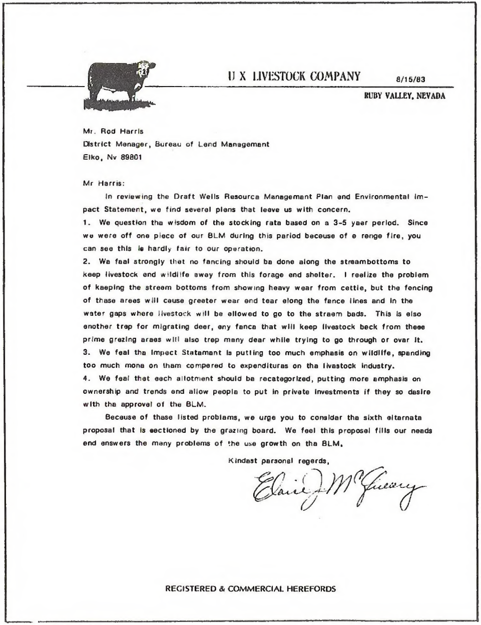
Dear Mr. Harris:

I am involved with my father in ranching in Clover Valley. As a user of the Chase Springs and Tobar Allotment area I endorse the Sixth Alternative to the Wells Environmental Statement for the Wells Resource Area Management Plan as developed by the grazing board. Please use this to develop a cooperative atmosphere of all those factions which use the Federal lands.

Sincerely,

Carol M Johns

Comment Letter 24



U X LIVESTOCK COMPANY
RUBY VALLEY, NEVADA

8/15/83

Mr. Rod Harris
District Manager, Bureau of Land Management
Elko, Nv 89801

Mr Harris:

In reviewing the Draft Wells Resource Management Plan and Environmental Impact Statement, we find several plans that leave us with concern.

1. We question the wisdom of the stocking rate based on a 3-5 year period. Since we were off one piece of our BLM during this period because of a range fire, you can see this is hardly fair to our operation.

2. We feel strongly that no fencing should be done along the streambottoms to keep livestock and wildlife away from this forage and shelter. I realize the problem of keeping the stream bottoms from showing heavy wear from cattle, but the fencing of these areas will cause greater wear and tear along the fence lines and in the water gaps where livestock will be allowed to go to the stream beds. This is also another trap for migrating deer, any fence that will keep livestock back from these prime grazing areas will also trap many deer while trying to go through or over it.

3. We feel the Impact Statement is putting too much emphasis on wildlife, spending too much money on them compared to expenditures on the livestock industry.

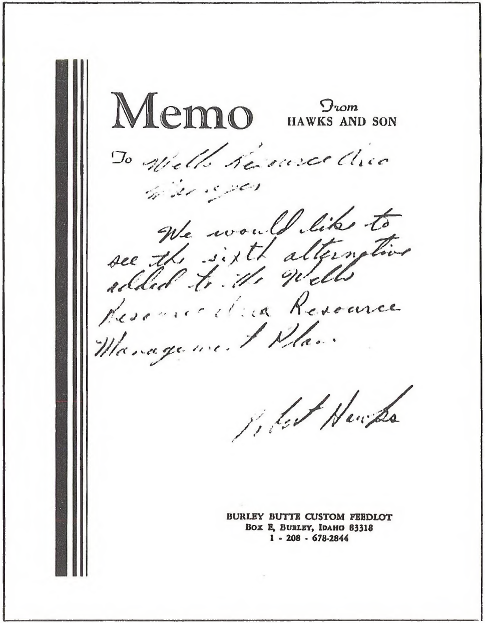
4. We feel that each allotment should be recategorized, putting more emphasis on ownership and trends and allow people to put in private investments if they so desire with the approval of the BLM.

Because of these listed problems, we urge you to consider the sixth alternate proposal that is sectioned by the grazing board. We feel this proposal fills our needs and answers the many problems of the use growth on the BLM.

Kindest personal regards,

REGISTERED & COMMERCIAL HEREFORDS

Comment Letter 25



Memo From HAWKS AND SON

To Wells Resource Area Manager

We would like to see the sixth alternative added to the Wells Resource Area Resource Management Plan.

Robert Hawks

BURLEY BUTTE CUSTOM FEEDLOT
Box E, Burley, Idaho 83318
1 - 208 - 678-2844

COMMENT ON WELLS EIS/RMP

June 21, 1983

The Resource Production Alternative is misnamed and / or analyzed incorrectly. It would only allow for a 1.2% increase in the preference. This is the first example of the negative thinking in preparing this document.

On page 2-1 this document describes "resource conflict areas." The second major topic of negative thinking. One of the benchmarks of ecology is the symbiotic relationship of plants and aminals. For example, the inferred conflict between deer, antelope, and cattle on the same range is more likely to be a complimentary association rather than an antagonistic one. If proper stocking rates and management are applied. Williams et al, 1981, found that deer preferred blue-bunch wheatgrass plants that had been defoliated the previous fall to those that had not. Other studies demonstrate that light grazing of bitterbrush is beneficial to wildlife.

The Resource Production Alternative should be the positive thinking plan and the one I support. However, the plan does not propose maximum production of the range resources for livestock. It is the opinion of many range managers, including agency personnel, that brush control on a crested wheatgrass seeding, for example, may only last 20 years until something needs to be done again whether or not it has been heavily grazed or lightly grazed. Our association has begun a brush control program on our private seedings which were planted about 20 years ago. This document doesn't propose anywhere near the needed maintenance of already existing improvements and seedings.

The Resource Protection Alternative is unacceptable. The underlying premise is that livestock grazing is always to the detriment of the other resources, and simply is not true.

The preferred alternative proposes seeding 10,000 acres and prescribed burning 3,500 acres in the O'Niel/Salmon Falls RCA (Table 2-5.) Although this is the same as proposed in the Resource Production Alternative, the amount of seeding would be about right for our allotment but not enough to spread between all the allotments in this RCA. The amount of burning is about ½% of the BLM acerage in the RCA. Fire can be the cheapest brush control tool available. It is well documented that the Juniper woodlands have increased because of man's over-control of wildfires. I am not advocating torching off vast acreages on all types of range sites and habitat types. If misused fire can create serious problems for wildlife, livestock, and the watershed.

The worst conflict with the critical deer winter range was the wild horse concentration occuring up until 1979. The control of the horses from those critical areas in Meadow Creek, the Granite Range and the L and D Mountains has already shown positive results. It's our opinion that with current stocking rates the critical deer ranges will continue to improve. The control of wild horse continuous grazing on riparion areas will also allow for improvement of these areas.

The Sage Hen population is thriving in the pasture north of Gollier Mountain. This area receives early spring use at moderate stocking rates. The area was also sprayed extensively for brush control in the middle 60's.

Their rating of the current management as "unsatisfactory" in the MSA reflects on themselves. The BLM has failed to maintain the ranges by brush control at proper intervals on portions of the range, reseeding defoliating ranges with an ineffective chance of natural recovery, maintaining water improvements, and building and maintenance of fences to control livestock. The inconsistencies in the BLM personnel and policies is the underlying problem of most of the failures.

The BLM's appraisal of the range conditions and trend of the Salmon River Allotment is contrary to anyone's opinion who has observed the vegetation over a long period of time.

On page 2-11, Issue 9, the short-term management action states "Improve 805 acres or 26.2 miles of deteriorated high priority riparian/stream habitat using techniques which would result in a minimum improvements of 30 percent of its condition in the short-term." This is highly unlikely! The BLM is overestimating the rate of recovery of the riparian system. There is much we don't know about riparian systems, hydrology, and the effect of livestock grazing. There have been very few properly conducted scientific experiments and observations of grazing affects of riparian areas. Results indicated, in a study by Hayes, 1978, that rest-rotation grazing did not significantly accelerate channel movement and that the occurrence of degradation during spring discharge along ungrazed streambanks was significantly greater than degradation occurring along grazed streambanks.

"Currently 87 percent or about 396 miles of streams are in a deteriorated state. Primarily as a result of livestock grazing...the ongoing decline would continue." (Page 4-11) That is an opinion not a scientific projection.

I agree that the proposed seedings would help solve the problem of spring forage and improve the native range condition on the higher precipatation sites because of longer deferral from grazing. (Resource Production Alternative, page 4-21, Issue 6, paragraph 2.)

The BLM shouldn't figure yearlings as a full Animal Unit. A yearling doesn't consume 26 lbs. dry matter per day. Holachak and Vavra (1982) determined steers had a mean forage intake level of 2.1% of body weight. Therefore, a 600 lb. steer would consume 12.6 lbs. dry matter per day.

Range managers are concerned about the plants physiological needs and rightly so, but we are ignoring the physiological needs of cattle. Why do cattle concentrate on riparian areas? Bryant (1982), studying response of livestock to riparian zone exclusion, concluded that regardless of aspect both cows with calves and yearlings generally selected the riparian zone over the upland zone throughout most of the summer. But both classes of livestock reversed their selection in favor of upland vegetation in September through October.

He reminds us that ungulates have few mechanisms to control body temperature. Cattle cope with excessive heat in the following ways: (1) increase respiration (2) consume water (3) restrict movements or rate of movements (4) seek more comfortable environmental conditions (5) perspire through relatively insufficient apocrine sweat glands. All of these reduce the metabolic rate.

In this same study, Bryant recorded that the temperature was cooler and humidity higher in the riparian zone during the summer. If we can figure out how to provide shade, water, and palatable forage at intervals away from the riparian zones, we should be able to better distribute livestock on the range and at the same time make them comfortable. If cattle are stressed they will not gain weight properly. Fencing of riparian zones will not solve the problem of livestock comfort or distribution, the cattle will merely concentrate along the fence. This study also found that salt placement did not affect livestock distribution.

Concerning the desire of the BLM to delay the turnout date of the cattle, this may be desirable for plant physiology but would be the economic ruin of our stockholders. Almost all of our cattle are wintered on irrigated farmland up until average turnout date of April 22. It is critical that the cattle be removed from the irrigated farm ground in order to plant crops and pre-irrigate the cropland. In addition, to feed 7,000 head of cattle $60 a ton hay at 22 pounds per head for one week would cost the Association $52,340.00. It currently costs more to produce a calf than we can get at the marketplace.

The best opportunity for delaying turnout on native ranges is to seed crested wheatgrass on appropriate sites to accommodate the livestock during this crucial period of native plant growth. We currently are working with the BLM to develop a plan for desirable grazing systems to meet the physiological requirements of the plants.

A BLM letter dated December 15, 1955, lists a ten year permit issued to the Association for 6,500cattle for eight months and 4,436 sheep for five months (Approximately 56,436 AUM's). In January 1962 and "agreement of understanding", the Association put "4,000 AUM's in suspended non-use until such time that more feed is available either through water developments, management, or artificial revegetation". The document lists our Class I demand at 31,304 AUM's (CFR 4110.0-5 (K)(I)). It also states "The Bureau of Land Management agrees to cooperate with the Salmon River Cattlemen's Association through management and/or revegetation to restore the suspended non-use."

We do agree that the potential for an economic return on investment is high. However, the Association has invested close to one million dollars in labor and materials over a long period of time and have not received

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credit from the BLM. Our only gain from this investment has been a few pounds of beef. Although the improvements we made were the responsible thing to do, it is not economically feasible to subsidize the BLM this way.

There are several sections of sagebrush between the San Jacinto Ranch Headquarters and highway 93 which have not been grazed by livestock for a period of time in excess of 30 years. Yet within the SVIM survey done in 1979 the BLM described it as in poor condition and in a downward trend. I agree with the poor ecological condition status, but I believe the trend is not apparent. Livestock grazing is obviously not the critical factor in the failure of the vegetation to progress toward a climax community or late seral state.

I believe the Grazing Board Alternative is a more positive and workable plan to get the BLM and resource users back in the range management business. If the BLM has the objective of increasing and using resource values, then it will take a committment of personel and funds to undertake 'on the ground' improvements.

I thank you for the opportunity to express some facts and observations of the Wells EIS and RMP. I hope you will have an open mind and truly study these comments.

Sincerely,

Glenn E. Shewmaker

Glenn E. Shewmaker

Comment Letter 26

Bryant, Larry D. (1982. Response of Livestock to Riparian Zone Exclusion. J., Range Manage. 35:780-785.

Holechek, Jerry L. and Martin Vavra. 1982 Forage Intake by Cattle on Forest and Grassland Ranges. J. Range Manage. 35: 737-741.

Hayes, F.A. 1978. Streambank stability and meadow condition in relation to livestock grazing in mountain meadows of central Idaho. M.S. Thesis. Univ. of Idaho. Moscow, ID. 91p.

Comment Letter 27

QUALITY LIVESTOCK
BOIES RANCHES
WELLS, NEVADA 89835

August 18, 1983

Mr. Rodney Harris, District Manager
Elko District-Bureau of Land Management
Box 831
Elko, NV 89801

Dear Mr. Harris;

These comments are given in response to the Draft Wells Resource Management Plan and Environmental Impact Statement by the owners and management of Boies Ranches.

We are vitally interested in all the resources in the area of our grazing license and the resources of the entire Wells Management area.

Thirty years ago this area was part of a pilot program to implement the multiple use concept of management of the public lands. Interest in this project may have diminished with some of the parties involved, but the multiple use concept has always been practiced in this area by the management of Boies Ranches.

In addition to the oral testimony given by Steven Boies at the June 21 1983 hearing held at Wells, Nevada, we would like to recommend the Sixth Alternative proposed by the Nevada Grazing Board for District N-1 be adopted. Please find copy enclosed.

In the interest of all concerns more money must be put into on the ground improvements. The study process has been much too costly in terms of man power and money. We are troubled by the futility of this process and feel it is time for the B.L.M. to move in the direction of constructive implementation. We must be mindful that the environmental values we all feel are so important are not placed in jeopardy.

One study may remain to be done. If each party involved would do a self-evaluation of their individual attitude, progress toward constructive goals would undoubtedly result. Without this effort progress will be impossible.

President Boies Ranches
Marla Griswold

Vice-President Boies Ranches
O. Steve Boies

FLYING "S" LAND & CATTLE COMPANY
BIG SPRINGS RANCH
WELLS, NEVADA 89835

15 August 1983

Rodney Harris
Elko District Manager
Bureau of Land Management
Elko, Nevada

Dear Sir:

These writings will serve as comments upon the "Draft Wells Resource Management Plan and Environmental Impact Statement," prepared by the U.S. Department of the Interior, Bureau of Land Management. They are written by Dick Roth, Ranch Manager, Big Springs Ranch, Flying 'S' Land & Cattle Co., Wells, Nevada, 89835.

"Livestock production is a major industry within the Wells RA" (WRA-RMP/EIS, p 3-21)..."The residents of the resource area perceive the livestock industry to be both socially and economically important to the community...In fact, ninety percent of the persons interviewed for the social analysis mentioned ranching as the number one industry associated with public lands..." (WRA-RMP/EIS, p 3-23).

As ranchers, we are well pleased with the BLM's attempt at a good neighbor policy. However, we are shocked at the antagonism encountered towards us as an industry throughout this document. Many things would lead us to believe that a "good neighbor" is simply "window dressing." What we see here is an end result of the "Preferred Alternative," - reduction of our AUM's to 48.1% of that to which we are now entitled. This, of course, would be economically catastrophic if it were carried through.

It is evident that those in the BLM who prepared this document do not understand the economics of ranching. An attempt to gloss over this inadequacy was rather lamely made on page 3-21: "Within the Wells RA, each ranch has a set of unique characteristics which will cause its operation to differ from those of the 'typical ranch.'" I need mention only two items from pp A5-2 through A5-5 to prove my assertion of lack of understanding.

1) The estimated sales price of cattle said to be the 1978 to 1980 average price is questionable, at best. (One could make a case that it has been wildly inflated.) My best guess is that it averages at least 15% higher than actual prices. This fact alone could vastly affect an assessment of the economic impact of the BLM's proposals.

2) Selling yearling steers and heifers requires feeding those animals through a winter. For ease of figuring, one can assume that each animal will consume one ton of hay per winter, (twenty pounds per day for one hundred days). Add this to one ton of hay

PHONE. ELKO, NEVADA, TOLL STATION BIG SPRINGS RANCH #1

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15 August 1983
Page Two

(approximately), per cow and bull in the herd, and one would have 3298 tons of hay to feed as per your example on page A5-5. At a price of $80. per ton of hay, this would be $263,840. worth of hay. Assuming that the ranch can produce hay at 85% of market value, we would expect the ranch to have to purchase $176,840. worth of hay to keep the animals alive that this document maintains that it does. However, this document shows *no* cost to purchase hay. This is patently ridiculous and shows the total lack of understanding of economics and realities that the BLM has of its "good neighbors."

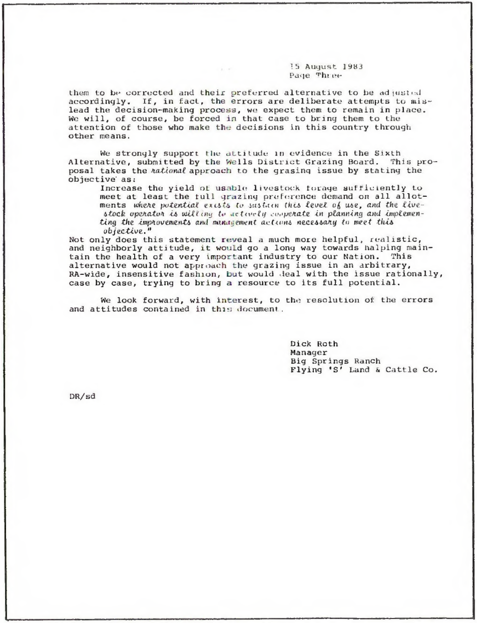
These are but two of many examples that would obviously wrongly influence the BLM's assessment of the ranchers ability to survive, having his AUM's drastically reduced as you have so blithely proposed to do to our operation and many others in this study. These fictional economic numbers for the "typical" ranch would lead the reader of this document to believe that ranchers are presently "rolling in cash." Of course, as any aware individual knows, the exact opposite is true. In fact, the ranching industry is struggling hard to improve range conditions and stocking rates so that it can conceivably operate at a profit. We don't need the Federal Government to take from us the few chances we may have to succeed. A truly "good neighbor" would help his neighbor to do what he has the ability to do, rather than impose conditions upon him that would force him to vacate his premises.

The BLM has gone on record in this document as "preferring" this alternative, saying that it does not "overly restrict the ability of other resources (i.e. ranching), to provide economic goods and services." It further states that this is "the best management action." (p 2-22.) We, of course, could not disagree more vehemently.

That the BLM does not consider ranching a resource worth protecting is shown further in its "Resource Protection Alternative." I originally thought we were at least considered a "resource" when the authors of this document designated the entire Wells area a "Resource Area," and further when they divided us up into "Resource Conflict Areas." (This term shows the negative attitude inherent in the entire study. A positive outlook could just as easily have chosen the term "Resource Cooperation Area." Surely this would show a more "good neighborly" underlying attitude. Unfortunately, it is more evident that the management of the USDI and the BLM have not effectively instilled even their rhetoric throughout the rank and file of their bureaucracies.) I assumed that we were at least considered a "resource" that was in conflict with others. But even if we are in "conflict" they have chosen not to "protect" us. To quote how the Resource "Protection" Alternative affects ranchers: "Ranchers would be extremely displeased with the AUM reductions in this alternative. Rancherd would be severly impacted and some would be put out of business." (p 4-52) This is "protection of a resource?"

I have presented just a small portion of the evidence that the BLM is highly antagonistic towards the ranching community, and would seemingly "prefer" to have ranchers out of business. If their calculations of our economic viability are simple errors, we would expect

Comment Letter 28



15 August 1983
Page Three

them to be corrected and their preferred alternative to be adjusted accordingly. If, in fact, the errors are deliberate attempts to mislead the decision-making process, we expect them to remain in place. We will, of course, be forced in that case to bring them to the attention of those who make the decisions in this country through other means.

We strongly support the attitude in evidence in the Sixth Alternative, submitted by the Wells District Grazing Board. This proposal takes the *rational* approach to the grasinq issue by stating the objective as:

> Increase the yield of usable livestock forage sufficiently to meet at least the full grazing preference demand on all allotments *where potential exists to sustain this level of use, and the livestock operator is willing to actively cooperate in planning and implementing the improvements and management actions necessary to meet this objective."*

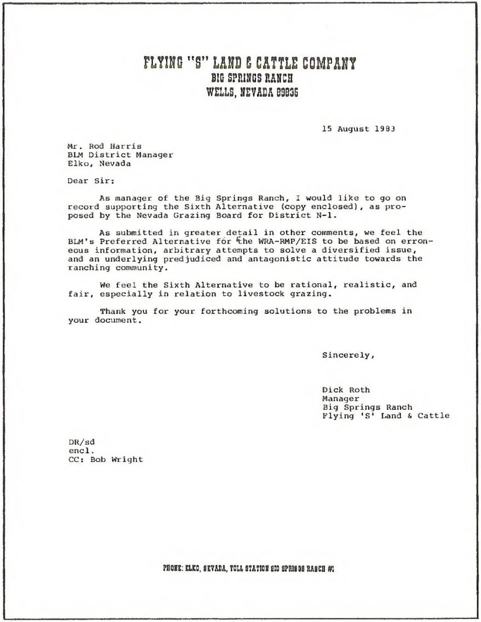
Not only does this statement reveal a much more helpful, realistic, and neighborly attitude, it would go a long way towards halping maintain the health of a very important industry to our Nation. This alternative would not approach the grazing issue in an arbitrary, RA-wide, insensitive fashion, but would deal with the issue rationally, case by case, trying to bring a resource to its full potential.

We look forward, with interest, to the resolution of the errors and attitudes contained in this document.

Dick Roth
Manager
Big Springs Ranch
Flying 'S' Land & Cattle Co.

DR/sd

Comment Letter 29



FLYING "S" LAND & CATTLE COMPANY
BIG SPRINGS RANCH
WELLS, NEVADA 89835

15 August 1983

Mr. Rod Harris
BLM District Manager
Elko, Nevada

Dear Sir:

As manager of the Big Springs Ranch, I would like to go on record supporting the Sixth Alternative (copy enclosed), as proposed by the Nevada Grazing Board for District N-1.

As submitted in greater detail in other comments, we feel the BLM's Preferred Alternative for the WRA-RMP/EIS to be based on erroneous information, arbitrary attempts to solve a diversified issue, and an underlying predjudiced and antagonistic attitude towards the ranching community.

We feel the Sixth Alternative to be rational, realistic, and fair, especially in relation to livestock grazing.

Thank you for your forthcoming solutions to the problems in your document.

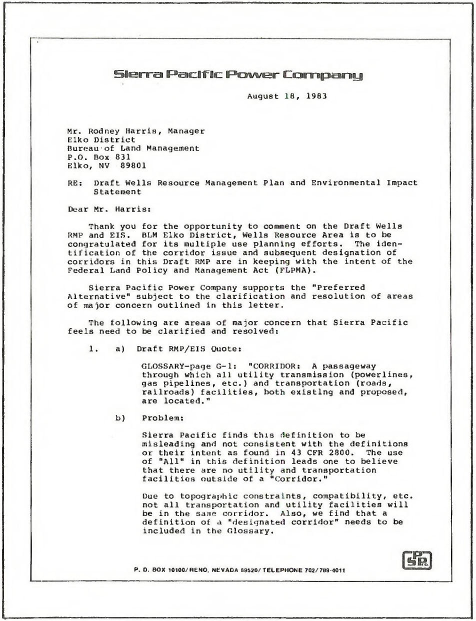
Sincerely,

Dick Roth
Manager
Big Springs Ranch
Flying 'S' Land & Cattle

DR/sd
encl.
CC: Bob Wright

PHONE: ELKO, NEVADA, TOLL STATION BIG SPRINGS RANCH #1

Comment Letter 30



Sierra Pacific Power Company

August 18, 1983

Mr. Rodney Harris, Manager
Elko District
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

RE: Draft Wells Resource Management Plan and Environmental Impact Statement

Dear Mr. Harris:

Thank you for the opportunity to comment on the Draft Wells RMP and EIS. BLM Elko District, Wells Resource Area is to be congratulated for its multiple use planning efforts. The identification of the corridor issue and subsequent designation of corridors in this Draft RMP are in keeping with the intent of the Federal Land Policy and Management Act (FLPMA).

Sierra Pacific Power Company supports the "Preferred Alternative" subject to the clarification and resolution of areas of major concern outlined in this letter.

The following are areas of major concern that Sierra Pacific feels need to be clarified and resolved:

1. a) Draft RMP/EIS Quote:

GLOSSARY-page G-1: "CORRIDOR: A passageway through which all utility transmission (powerlines, gas pipelines, etc.) and transportation (roads, railroads) facilities, both existing and proposed, are located."

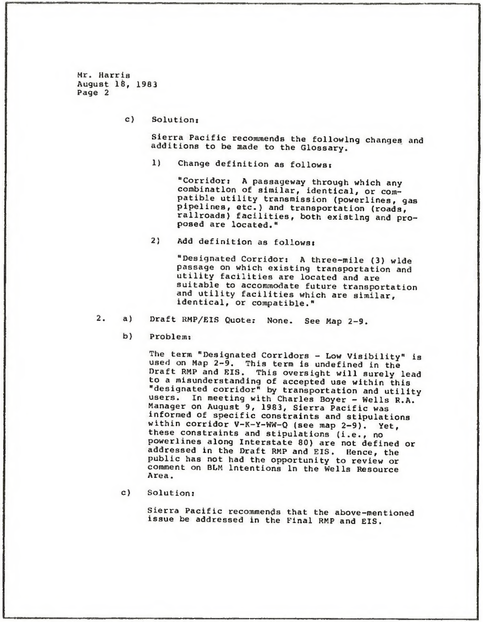
b) Problem:

Sierra Pacific finds this definition to be misleading and not consistent with the definitions or their intent as found in 43 CFR 2800. The use of "All" in this definition leads one to believe that there are no utility and transportation facilities outside of a "Corridor."

Due to topographic constraints, compatibility, etc. not all transportation and utility facilities will be in the same corridor. Also, we find that a definition of a "designated corridor" needs to be included in the Glossary.

P. O. BOX 10100/RENO, NEVADA 89520/TELEPHONE 702/789-4011

Comment Letter 30



Mr. Harris
August 18, 1983
Page 2

c) Solution:

Sierra Pacific recommends the following changes and additions to be made to the Glossary.

1) Change definition as follows:

"Corridor: A passageway through which any combination of similar, identical, or compatible utility transmission (powerlines, gas pipelines, etc.) and transportation (roads, railroads) facilities, both existing and proposed are located."

2) Add definition as follows:

"Designated Corridor: A three-mile (3) wide passage on which existing transportation and utility facilities are located and are suitable to accommodate future transportation and utility facilities which are similar, identical, or compatible."

2. a) Draft RMP/EIS Quote: None. See Map 2-9.

b) Problem:

The term "Designated Corridors - Low Visibility" is used on Map 2-9. This term is undefined in the Draft RMP and EIS. This oversight will surely lead to a misunderstanding of accepted use within this "designated corridor" by transportation and utility users. In meeting with Charles Boyer - Wells R.A. Manager on August 9, 1983, Sierra Pacific was informed of specific constraints and stipulations within corridor V-K-Y-WW-Q (see map 2-9). Yet, these constraints and stipulations (i.e., no powerlines along Interstate 80) are not defined or addressed in the Draft RMP and EIS. Hence, the public has not had the opportunity to review or comment on BLM intentions in the Wells Resource Area.

c) Solution:

Sierra Pacific recommends that the above-mentioned issue be addressed in the Final RMP and EIS.

Comment Letter 30

Mr. Harris
August 18, 1983
Page 3

3. a) Draft RMP/EIS Quote:

Chapter 2 - Alternatives - Preferred Alternative - Issue 2: CORRIDORS - page 2-22

"3. Propose for designation...Power Projects. Also included is a narrowed width of the MM-NN corridor segment and selection of the P-GG-Q corridor segment to protect wilderness quality of the South Pequop and Goshute Peak WSAs respectively."
(Emphasis Added)

Chapter 4 - Environmental Consequences - Mid-range Alternative - Issue 2: CORRIDORS - page 4-31 (Preferred Alternatives same as Mid-range Alternative)

"2. Resource values would be degraded.

Designation and/or identification of 566 miles of corridors is expected to have significant short- and long-term adverse impacts to visual quality, wilderness character and wildlife habitat. These resources would be affected because of the locations of some of the corridors. Impacts are generally fewer than in the Resource Production Alternative. Corridor segments G-F; K-I; I-U; and U-H on Map 2-9 would cause significant visual impairment.

1 The solitude and primitive recreation experience within the northern portion of the South Pequop WSA would be impaired by the adjacent corridor segment MM-NN. Corridor segment Q-XX-P would be within the southeastern portion of the Goshute Peak WSA. The location of the power line, railroad and/or other transportation routes in this area would not only greatly impair the experience of solitude and primitive recreation but would also cause the loss of naturalness in the area."
(Emphasis Added)

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Mr. Harris
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b) Problem:

1 Sierra Pacific finds the above statements unacceptable as written. These statements constitute a "wilderness buffer zone" around the Wilderness Study Areas in the Wells Resource Area. Not one corridor shown in the Preferred Alternative encroachs upon a WSA. Corridor distances from WSA boundaries range from common boundaries to a six-mile (6) separation. Sierra Pacific feels that Congress did not intend to create wilderness buffer zones. If a WSA cannot stand on its own merit as outlined in the Wilderness Act of September 3, 1964, then the WSA unit should be recommended as unsuitable for inclusion in the National Wilderness Preservation System. An example would be the suggested loss of naturalness in Goshute Peak WSA because of the influence of the corridor which lies outside the WSA boundary. When the Wilderness Act talks of solitude or primitive and unconfined type of recreation, it was looking to preserve those opportunities within a given area or boundary. There is nothing to our knowledge in the Wilderness Act that states or implies that man's imprint will not be seen from a wilderness area.

c) Solution:

1 Sierra Pacific recommends that the BLM rewrite the environmental consequences for the corridor issue. Adverse impact on wilderness characteristics is improperly applied to the corridor.

4. a) Draft RMP/EIS Quote:

Chapter 4 - Environmental Consequences - Mid-range Alternative - Issue 2: CORRIDORS page 4-31 (Preferred Alternative same as Mid-range Alternative),

"Bald eagles would be adversely impacted from increased shooting deaths as a result of powerline placement near highways on segment P-O. Wintering bald eagles would be adversely impacted if construction took place from November 1 to March 31 on segment I-U."

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Page 5

b) Problem:

Sierra Pacific questions the first sentence of the above-mentioned paragraph. Sierra Pacific is unaware of any shooting of bald eagles from power lines in this state. Further, BLM appears to have taken the position that a supposed adverse impact to bald eagles by power line placement cannot be mitigated. This is totally incorrect. The utility industry, through years of research and experience, is able to mitigate adverse impacts to raptors. Mitigation measures can either enhance raptor habitat or deter raptors from areas such as mentioned in this RMP.

c) Solution:

The entire paragraph on bald eagles deals in areas of mitigations. Thus, the adverse impacts of power lines and construction time are not environmental consequences but mitigation measures. Mitigation is project related on a case by case basis and would be a condition of a grant of right-of-way. Therefore, Sierra Pacific Power Company requests the deletion of the entire paragraph in the Final RMP and EIS.

5. a) Draft RMP/EIS Quote: None. (See Map 2-9)

b) Problem:

Mapping of the Corridors is of extreme importance in land use planning process. This mapping becomes the public documentation (Resource Management Plan) with which the BLM will manage public lands for this use. Therefore, the need for complete and reasonably accurate maps is essential. Corridor A or E-PP-1-U-ZZ-B was to represent the AT&T Transcontinental Cable. This corridor was also represented in the Western Regional Corridor Study. From a field investigation on August 9, 1983, it would appear that corridor A or E-PP-I-U-ZZ-B on Map 2-9 is located south of the actual location of the AT&T Cable.

Also, Sierra Pacific finds some corridors located (see Exhibits "A" and "B") in areas having either no potential for utilization as corridors or corridors excluded where facilities presently exist.

Mr. Harris
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Page 6

c) Solution:

Because of the crucial and essential need for corridor mapping in the Final RMP and EIS, Sierra Pacific strongly urges and recommends the following:

1) Accurately locate the AT&T Transcontinental Cable on Map 2-9.

2) Implement the corridor changes and additions shown on the attached "Wells" 1:250,000 Quad Map (Exhibit "A") and the "Elko" 1:250,000 Quad Map (Exhibit "B"). The solid black line represents the Draft RMP and EIS corridor location. The solid red line represents the requested corridor changes and additions. Also attached for your information is a graphic display of the mapping discrepancies and changes.

3) Attached is a brief summary, hereto referred to as Exhibit "C," of each corridor segment describing in general what and where the corridor traverses, pointing out any exceptions to the corridor widths and locations. BLM may want to consider implementing portions of this in the Final RMP and EIS.

6. a) Draft RMP and EIS Quote:

Chapter 2 - Preferred Alternative - Issue 1:
Lands page 2-22

> "Objective: To allow disposals, land tenure adjustments, and land use authorizations based on long-range goals. These goals are to identify lands to be disposed of or retained and administered for multiple use. These identifications are based on land manageability and quality of resource values and are shown on Map 2-7.
>
> Short- and Long-Term Management Action: Dispose of 93,150 acres, including community expansion lands, primarily through public sale."

b) Problem: Sierra Pacific Power Company has purchased the Gamble-Winecup Ranches for the proposed Thousand Springs Power Plant. Our concern centers around the land tenure adjustments in the Thousand Springs Creek and Toano Draw area. Sierra Pacific does not find definitions or explanation to the terms Retention/Consolidation - R/C or Retention/Management - R/M referenced on Map 2-7.

Can exchanges or sales be made in either R/C or R/M areas? Can a power plant site be "blocked" up in either R/C or R/M areas?

c) Solution: As you can see, Sierra Pacific has many questions as to the impact of land tenure adjustment in the Draft RMP and EIS. Sierra Pacific requests that Land Tenure Adjustments not preclude acquisitions by direct sale or exchange of lands for a power plant site.

Sierra Pacific is anxious to have the corridor issue in the Wells RMP developed with the most up-to-date and complete data. Sierra Pacific feels the Wells RMP is the cornerstone for the guidance and direction of the future RMP's to be developed in Nevada. Sierra Pacific feels consistency of the RMP's on the corridor issue is essential to developing a statewide transportation and utility corridor system.

We hope that our comments and concerns will be instrumental in the outcome of the Wells RMP.

Sincerely,

Michael P. Sullivan
Manager, Environmental Affairs
& Right-of-Way Acquisition

MPS/cf
EAE4/69-84

Attachment

cc: Ed Spang - BLM, Nevada State Director, Reno
Stu Gearhart - BLM, Reno

EXHIBIT "C"

SUMMARY - CORRIDOR SEGMENTS

This exhibit is hereby made a part of Sierra Pacific's comments on the Draft Wells RMP and EIS.

The following is a written analysis of the proposed Corridor Map 2-9 in the Draft RMP and EIS. This written analysis is to be used along with Exhibits "A" and "B." This analysis will address the BLM proposals and requested changes by Sierra Pacific.

Corridor Segment		Comments
F-G	RMP:	A one and one-half mile corridor each side of Highway 93 from the Idaho border to Henry, Nevada; thence, straight south presumably following the Idaho Power Co. 138 kV transmission line to intersection with Sierra Pacific's 345 kV transmission line.
	SPPCO:	The corridor needs to be modified as shown on Exhibit "A." A corridor thru the Jackpot community and its logical expansion is not useable. If BLM wishes to include Highway 93, Sierra Pacific would then request the expansion of the corridor to the red line on the west. The changes south of Jackpot to "G" are self explanatory.
G-PP-A-E	RMP:	It is presumed that the intent of this corridor was to follow the existing SPPCo. 345 kV transmission line and AT&T Cable.
	SPPCo.	The plotting of the 345 kV transmission line has pointed out some major mapping discrepancies. Also, field investigation has found extensive agricultural development around the Mary's River Ranch. Exhibit "A" reflects where the corridor should be along with some suggested changes. Also, the AT&T Cable needs to be located in this area.

G-H-I-K	RMP;	It is presumed that the intent of this corridor was to generally follow the IPCo. 138kV transmission line and Highway 93 to Wells, Nevada.
	SPPCo:	"Suggest that the corridor be designated as outlined on Exhibit "A."
H-U-S		No mapping problems.
PP-I-U-ZZ-B	RMP:	This corridor was generally shown on the Western Regional Corridor Study and is supposed to be AT&T Cable.
	SPPCo:	Field investigation shows the AT&T Cable to be farther north. The AT&T Cable needs to be more accurately located on Map 2-9. Sierra Pacific will offer BLM assistance in this matter upon request.
S-B	RMP:	This corridor generally follows the Southern Pacific Railroad and Highway 30 from Cobre, Nevada, to a point approximately three miles northeast of Montello, Nevada; thence, north to the presumed AT&T Cable corridor.
	SPPCo:	The corridor on the south side of the Southern Pacific Railroad from three miles northeast of Montello, Nevada, to the Utah border should be included in the Final RMP and EIS. BLM has cited the Peregrine Falcon habitat as the reason for excluding this corridor. Sierra Pacific does not support or agree with these findings. BLM is basing its decision on historical habitat as stated on page 3-9 of the Draft RMP and EIS. The Draft RMP and EIS does not inventory any Peregrine Falcons within this area.
V-K-Y		No mapping problems.
S-K	RMP:	No continuous corridor along Southern Pacific Railroad from Cobre, Nevada, to Wells, Nevada.
	SPPCo:	This corridor should be included in the Final RMP and EIS in order to provide for a continuous transportation corridor.
K-MM-NN and K-MM-R	RMP:	Narrowed width of MM because of WSA to the south.
	SPPCo:	Basically these corridors are useable with the exception of the crossing of the Pequop Mountains. Because of topographic constraints, a split corridor is recommended as shown on Exhibit "B."
R-NN-RR-M-LL	RMP:	Corridor follows the Nevada Northern Railroad.
	SPPCo:	No problem with mapping or corridor to Currie (M). Corridor segment M-LL should be moved west as shown on Exhibit "B" so as to avoid Goshute Lake.
RR-O and M-O		No mapping problems.
S-Y-R; S-WW and Y-WW	RMP:	Map 2-9 is self-explantory of area.
	SPPCo:	S-WW corridor as mapped by BLM would traverse along the top of the Toano Range. Also in this area, a portion of the Western Pacific Railroad is not included in a corridor. Sierra Pacific recommends that the corridors be altered in this area per Exhibits "A" and "B."
WW-O	RMP:	This corridor generally follows I-80 to Wendover, Utah.
	SPPCo:	Passage of transportation and utility facilities thru Wendover are greatly constrainted by the mountains on the north and the U.S. Air Force base on the south. This, coupled with the community expansion, makes passage extremely difficult. Sierra Pacific recommends a two-mile (2) wide corridor on the north side of the mountains as shown on Exhibit "B."

Comment Letter 30

Q-GG-P-O and Q-XX-P-O	RMP:	The map and EIS is self-explanatory.
	SPPCo:	WSA's topographic constraints and military installations are the prime factors in recommending the corridors as shown on Exhibit "B." This recommendation provides for a more useable and feasible corridor than presently given in the Draft RMP and EIS.
Utah Corridors	RMP:	Not addressed.
	SPPCo:	These two, two-mile wide corridors were addressed in the Western Regional Corridor Study - May 1980 - Utah. The Nevada map of this study overlooked these corridors. Sierra Pacific questions whether the Elko District has contacted the adjacent BLM Districts in Utah to discuss the corridor issue. Sierra Pacific recommends that these corridors be addressed in the Final RMP and EIS.

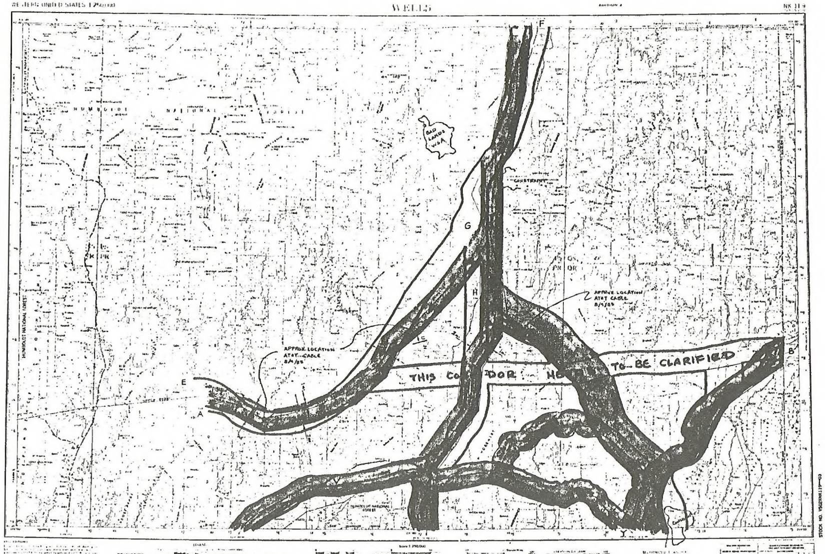
Response Letter 30

RESPONSE

1 The impact analyses in the RMP for wilderness was guided by the Wilderness Management Policy and the Wilderness Study Policy. The Wilderness Study Policy, published February 3, 1982, allows for the consideration of outside sights and sounds during the wilderness study. It is stated on page 18 of the Wilderness Study Policy that "Consideration of Outside Sights and Sounds: During the wilderness study, sights and sounds of human activities and works outside the boundaries of the wilderness study area may be taken into account in assessing the quality of an area's naturalness or its opportunities for solitude or primitive recreation. Any influence of outside sights and sounds upon naturalness or opportunities for solitude or primitive recreation within the WSA should be documented."

Refer to Map 2-9 of the Draft Wells RMP for corridor locations in the Midrange and Preferred Alternatives. The Midrange Alternative on Map 2-9 shows corridor segment Q-XX-PP penetrating the southwest portion of the Goshute Peak WSA while the Preferred Alternative displays corridor segment Q-GG-PP outside the boundary of the WSA.

Comment Letter 30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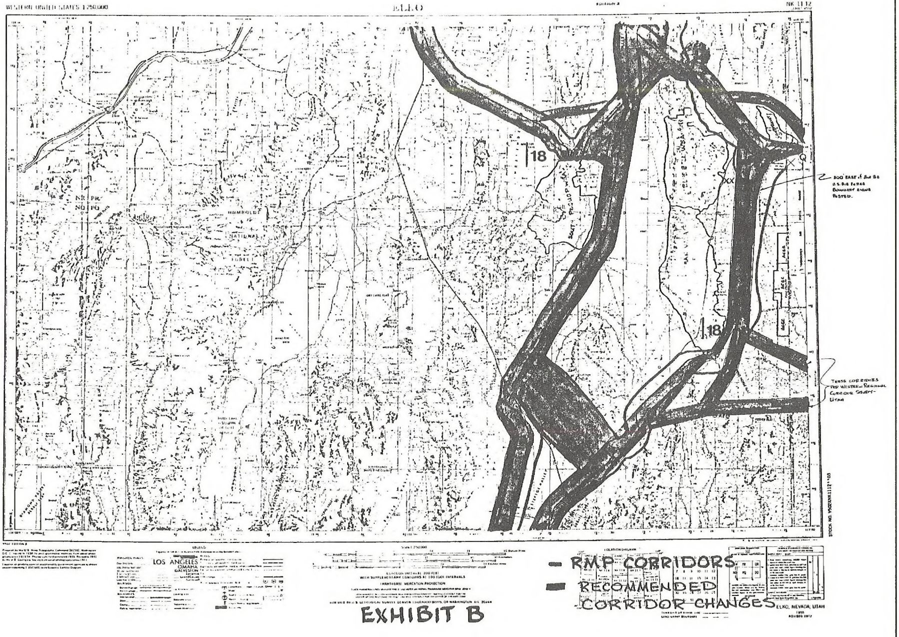
— RMP CORRIDORS

— RECOMMENDED CORRIDOR CHANGES

EXHIBIT A

Comment Letter 30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Those corridors per Western Regional Corridor Study-Utah
LOS ANGELES
OMAHA
GALVESTON
CONTOUR INTERVAL 200 FEET
WITH SUPPLEMENTARY CONTOURS AT 100 FOOT INTERVALS
TRANSVERSE MERCATOR PROJECTION
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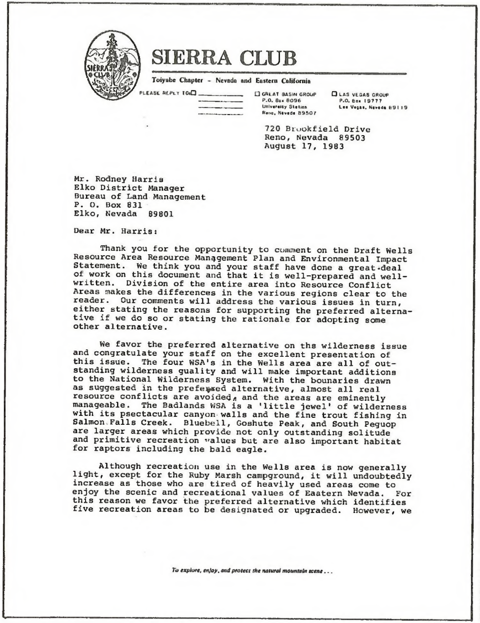
ELKO, NEVADA; UTAH
– RMP CORRIDORS
▬ RECOMMENDED CORRIDOR CHANGES

EXHIBIT B



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P.O. Box 19777
Las Vegas, Nevada 89119

720 Brookfield Drive
Reno, Nevada 89503
August 17, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
P. O. Box 831
Elko, Nevada 89801

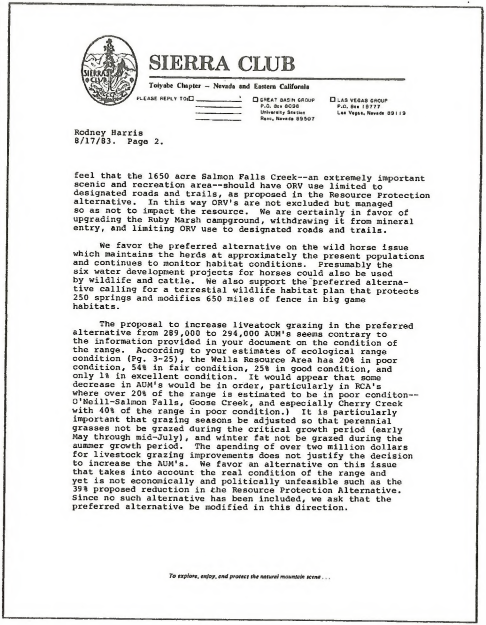
Dear Mr. Harris:

Thank you for the opportunity to comment on the Draft Wells Resource Area Resource Management Plan and Environmental Impact Statement. We think you and your staff have done a great deal of work on this document and that it is well-prepared and well-written. Division of the entire area into Resource Conflict Areas makes the differences in the various regions clear to the reader. Our comments will address the various issues in turn, either stating the reasons for supporting the preferred alternative if we do so or stating the rationale for adopting some other alternative.

We favor the preferred alternative on ths wilderness issue and congratulate your staff on the excellent presentation of this issue. The four WSA's in the Wells area are all of outstanding wilderness quality and will make important additions to the National Wilderness System. With the bounaries drawn as suggested in the preferred alternative, almost all real resource conflicts are avoided, and the areas are eminently manageable. The Badlands WSA is a 'little jewel' of wilderness with its psectacular canyon walls and the fine trout fishing in Salmon Falls Creek. Bluebell, Goshute Peak, and South Pequop are larger areas which provide not only outstanding solitude and primitive recreation values but are also important habitat for raptors including the bald eagle.

Although recreation use in the Wells area is now generally light, except for the Ruby Marsh campground, it will undoubtedly increase as those who are tired of heavily used areas come to enjoy the scenic and recreational values of Eastern Nevada. For this reason we favor the preferred alternative which identifies five recreation areas to be designated or upgraded. However, we

To explore, enjoy, and protect the natural mountain scene . . .



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Rodney Harris
8/17/83. Page 2.

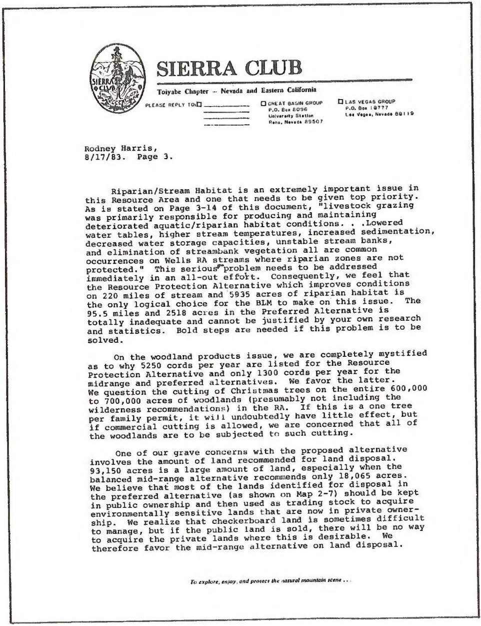
feel that the 1650 acre Salmon Falls Creek--an extremely important scenic and recreation area--should have ORV use limited to designated roads and trails, as proposed in the Resource Protection alternative. In this way ORV's are not excluded but managed so as not to impact the resource. We are certainly in favor of upgrading the Ruby Marsh campground, withdrawing it from mineral entry, and limiting ORV use to designated roads and trails.

We favor the preferred alternative on the wild horse issue which maintains the herds at approximately the present populations and continues to monitor habitat conditions. Presumably the six water development projects for horses could also be used by wildlife and cattle. We also support the preferred alternative calling for a terrestial wildlife habitat plan that protects 250 springs and modifies 650 miles of fence in big game habitats.

The proposal to increase livestock grazing in the preferred alternative from 289,000 to 294,000 AUM's seems contrary to the information provided in your document on the condition of the range. According to your estimates of ecological range condition (Pg. 3-25), the Wells Resource Area has 20% in poor condition, 54% in fair condition, 25% in good condition, and only 1% in excellent condition. It would appear that some decrease in AUM's would be in order, particularly in RCA's where over 20% of the range is estimated to be in poor conditon--O'Neill-Salmon Falls, Goose Creek, and especially Cherry Creek with 40% of the range in poor condition.) It is particularly important that grazing seasons be adjusted so that perennial grasses not be grazed during the critical growth period (early May through mid-July), and winter fat not be grazed during the summer growth period. The spending of over two million dollars for livestock grazing improvements does not justify the decision to increase the AUM's. We favor an alternative on this issue that takes into account the real condition of the range and yet is not economically and politically unfeasible such as the 39% proposed reduction in the Resource Protection Alternative. Since no such alternative has been included, we ask that the preferred alternative be modified in this direction.

To explore, enjoy, and protect the natural mountain scene . . .

Comment Letter 31



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Rodney Harris,
8/17/83. Page 3.

Riparian/Stream Habitat is an extremely important issue in this Resource Area and one that needs to be given top priority. As is stated on Page 3-14 of this document, "livestock grazing was primarily responsible for producing and maintaining deteriorated aquatic/riparian habitat conditions. . .Lowered water tables, higher stream temperatures, increased sedimentation, decreased water storage capacities, unstable stream banks, and elimination of streambank vegetation all are common occurrences on Wells RA streams where riparian zones are not protected." This serious problem needs to be addressed immediately in an all-out effort. Consequently, we feel that the Resource Protection Alternative which improves conditions on 220 miles of stream and 5935 acres of riparian habitat is the only logical choice for the BLM to make on this issue. The 95.5 miles and 2518 acres in the Preferred Alternative is totally inadequate and cannot be justified by your own research and statistics. Bold steps are needed if this problem is to be solved.

On the woodland products issue, we are completely mystified as to why 5250 cords per year are listed for the Resource Protection Alternative and only 1300 cords per year for the midrange and preferred alternatives. We favor the latter. We question the cutting of Christmas trees on the entire 600,000 to 700,000 acres of woodlands (presumably not including the wilderness recommendations) in the RA. If this is a one tree per family permit, it will undoubtedly have little effect, but if commercial cutting is allowed, we are concerned that all of the woodlands are to be subjected to such cutting.

One of our grave concerns with the proposed alternative involves the amount of land recommended for land disposal. 93,150 acres is a large amount of land, especially when the balanced mid-range alternative recommends only 18,065 acres. We believe that most of the lands identified for disposal in the preferred alternative (as shown on Map 2-7) should be kept in public ownership and then used as trading stock to acquire environmentally sensitive lands that are now in private ownership. We realize that checkerboard land is sometimes difficult to manage, but if the public land is sold, there will be no way to acquire the private lands where this is desirable. We therefore favor the mid-range alternative on land disposal.

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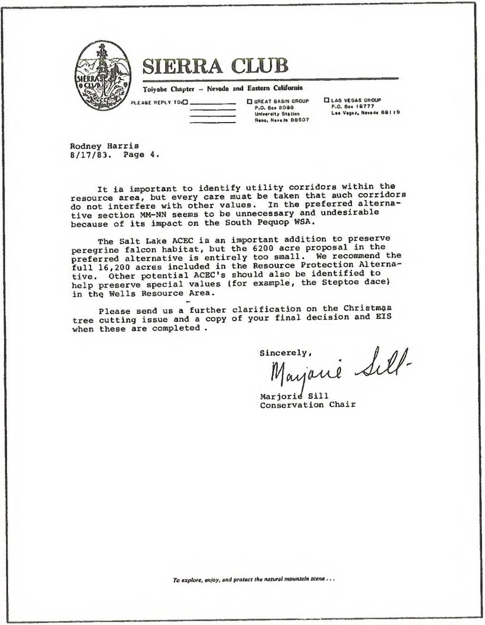
Comment Letter 31



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Rodney Harris
8/17/83. Page 4.

It is important to identify utility corridors within the resource area, but every care must be taken that such corridors do not interfere with other values. In the preferred alternative section MM-NN seems to be unnecessary and undesirable because of its impact on the South Pequop WSA.

The Salt Lake ACEC is an important addition to preserve peregrine falcon habitat, but the 6200 acre proposal in the preferred alternative is entirely too small. We recommend the full 16,200 acres included in the Resource Protection Alternative. Other potential ACEC's should also be identified to help preserve special values (for example, the Steptoe dace) in the Wells Resource Area.

Please send us a further clarification on the Christmas tree cutting issue and a copy of your final decision and EIS when these are completed .

Sincerely,

Marjorie Sill

Marjorie Sill
Conservation Chair

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☐ LAS VEGAS GROUP
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Las Vegas, Nevada 89119

August [illegible]7, 1983

Rod Harris, Manager
BLM/Elko District
PO Box 831
Elko, NV 89801

Dear Manager Harris,

On behalf of the Public Lands Committee of the Toiyabe Chapter of the Sierra Club, I am submitting these comments supplemental to my testimony at the 6/20/83 public hearing in Reno on the Draft Wells Resource Area RMP and EIS.

Before commenting on the substance of the document, I would like to compliment the authors on a well-written, well-organized and readable document. I only wish the substance of the document had measured up to its style!

CHAPTER 1: PLANNING ISSUES AND CRITERIA

The stated overall purpose of the resource management planning process (p.1-1) is rather utilitarian. We would like to believe that the Bureau is striving to improve the resources of the resource area whether or not the improvements would result in increased goods and services to the users or public, but because we are all striving to be good stewards of the land and all its resources, are we not?

It is not clear from the document what vegetation inventory data (1-2) is available or used by BLM. Table A2-2 cites no source. Is the estimated ecological range condition based on a vegetation inventory? If so, how and when was the inventory taken?

In Issue 2 (1-5), key or critical wildlife habitats should be added as a category that should not be adversely affected by utility or transportation corridors.

In Issue 4, Planning Criteria 2 (1-5), it is not stated that ORVs will be limited or closed if ORV use results in visual or environmental degradation, specifically, scars on hills or erosion. Isn't BLM concerned about these problems and should they not be part of the RMPlan?

In Issue 6, Planning Criteria (1-7), what happened to livestock reductions as a means of range improvement? We are certain we raised this as an issue during scoping. We feel BLM should be capable of adjusting numbers to the carrying capacity of the range because in Issue 7, Planning Criteria 2 (1-7), it is proposed to establish maximum wildhorse numbers compatible with vegetation requirements. Please explain.

Also on Issue 6, Planning Criteria 1, we are concerned with the broad wording of the section on water developments for cattle. We certainly would not support any expenditure of funds for this purpose unless BLM guarantees that an adequate supply of water would be left at the source for wildlife and existing riparian vegetation would be maintained. Perhaps such language should be included in this planning criteria.

In Issue 9, Planning Criteria 3 (1-8), we noticed that no priority is given to most wildlife species (non-game and non-T&E) for special management consideration in aquatic and riparian areas. Since the documents states that most species are highly dependent on riparian areas for food, cover, and water, we feel that a third category - all non-game animals - should be added to this planning criteria.

CHAPTER 2: ALTERNATIVES

RCAs. The division of the Wells RA into resource conflict areas is unique to this district. While it appears to make writing and reviewing this document easier, we fear that it contributes to the lack of specificity in resource problem identification and proposed management actions for real on-the-ground problems.

Doesn't the Spruce/Goshutes RCA (2-1) contain wildlife? If so, are there not serious resource problems between wildlife and livestock? We have the same question on the Pilot/Crittenden RCA (2-2) and the Ruby/Wood Hills RCA (2-2).

Selective Management Categorization. This process (2-2) has always filled us with great dismay. How allotments are categorized and what the short and long term effects of such categorizations will be are unknown. Why the permittees doing the best job (M allotments) are not rewarded in favor of others who have more problems, and how C allotments are written off by BLM as not improvable violate not only common sense, but also our strong values of resource conservation and good land stewardship.

In particular, the selective management categorization in this document is obscure and implausible. While the criteria identified in Appendix 2 are clear, the judgments, apparently not subject to public review, some how resulted in an inordinate number of M allotments. The characteristics for M allotments (2-27&28) do not match up with the estimated ecological condition in Table A2-2, nor the allotment categorizations in Table A2-1. For instance, resource conflicts are identified in many allotments which are then judged to be M. Yet, M allotments are supposed to have resource conflicts that can be corrected with minimal effort. Are we then to believe that the 12 allotments with I or C resource conflicts which were judged to be in the M category anyway hava easily corrected resource conflicts? Or that the 3 RCAs with a high intensity conflict level have 16 out of a total of 29 allotments in the M category - i.e., all have current satisfactory conditions? We are dissatisfied with this process and feel it should be opened up for public scrutiny.

Table 2-1 (2-3) is also confusing. In the allotments' where grazing preference used exceeds 100%, are we to understand that the percentage over 100% represents overgrazing, trespass grazing, or temporary non-renewable use or something else?

Management Alternatives. We disagree with the decision to eliminate from study a no grazing alternative. An EIS is not a decision document, but is written to analyze the environmental impacts of BLM actions. A no grazing alternative would provide the baseline data against which to judge other alternatives. We fear that it was eliminated not because of political infeasibility, but because an analysis would show that the environmental impacts of not grazing the public lands would have far more beneficial effects on all natural resources, besides being much cheaper than all the other alternatives, that the BLM decision-makers and the public would have to reconsider whether the public benefits of livestock grazing as currently practiced outweigh its public costs. Besides, such an alternative is required by the court order which mandated grazing EISs!

The discussion of the categorization of the Wells RA into three management classifications (2-2) was very perfunctory. Are we to understand that all lands identified for disposal (D) are difficult to manage and have essentially no resource values? And are resource values fewer and consequently, less cost effective to manage in Retention/Management (R/M) areas than in Retention/Consolidation (R/C) areas? We're not sure what this language means. Map 2-7 is rather large scale. It is difficult to identify the differences between R/M and R/C lands or why the huge area around Montello is any more worthless than the other checkerboard areas. And since it's public knowledge that many wildlife species, including antelope and elk use the lower lying areas slated for disposal, how does BLM justify that the D lands have no resource values?

ISSUE 1: LANDS. We support the Resource Protection Alternative proposal on lands. Although we generally support public land disposal for community expansion, we greatly object to the disposal of 72,245 acres around Montello in the Resource Production and Preferred Alternatives. At first, we thought the acreage must be a typo as the other communities, West Wendover, Jackpot, and Wells, average about 7000 acres each proposed for disposal. But the inflated figure is repeated throughout the document. If real, no explanation or justification is given for the huge expansion planned for Montello. Please provide additional information in the FEIS.

ISSUE 2: CORRIDORS. We support the Resource Protection Alternative proposal on corridors. We totally reject the 1023 miles proposed in the Resource Production as exhorbitant. It appears that more acreage for corridors is proposed than acreage for wilderness. We do not understand how BLM can propose many of the corridors as the proposals violate the planning criteria set out in Chapter 1. The EIS documents that some proposed corridors have significant negative impacts on wilderness areas, ACECs, peregrine falcons and eagles, summer deer range and visual

quality, impacts which should disqualify these sections. Explain.

ISSUE 3: ACCESS. We support the Midrange Alternative on access. BLM does the public a disservice by separating the need for access for administrative and commodity users from other users.

ISSUE 4: RECREATION. We support the Preferred Alternative proposal on recreation.

ISSUE 5: WILDERNESS. We support the Resource Protection Alternative proposal on wilderness. We do indeed feel that the Elko District wilderness inventory was too restrictive in selecting WSAs for review. The four remaining are indeed the very best and should be recommended for wilderness designation. Detailed comments on wilderness will be submitted separately.

ISSUE 6: LIVESTOCK GRAZING. We support the Resource Protection Alternative proposal for livestock grazing, only because we have no other choice. From the information available in the EIS, we do not know if 176,211 AUMs use is within the carrying capacity of the Wells RA or how BLM arrived at this precise number, but are sure that some reductions will benefit all other resources. We are also sure from BLM "estimates" of range condition and muted recital of resource problems that current use, 288,934 AUMs, is contributing to massive resource problems and conflicts and that the 293,846 AUM figure proposed in the Preferred Alternative is a blatant violation of the law which requires sustained yield management on the public lands.

ISSUE 7: TERRESTRIAL WILDLIFE HABITAT. We support the fence modification and spring protection proposed in the Resource Protection and Preferred Alternatives and the ACEC proposal in the Resource Protection Alternative. These proposals are among the best made in this EIS and we commend the Elko District on the identification and analysis of terrestrial wildlife habitat problems.

Our only criticism lies in the superficial treatment of livestock grazing as a problem and livestock grazing management as a part of the solution. For example, in the preferred alternative (2-24), it is stated that BLM will "consider adjustments" in livestock use to maintain essential or crucial wildlife habitats. We hope BLM will implement adjustments in livestock numbers as well as seasons-of-use to maintain critical wildlife habitats and to improve habitats as well. A good livestock grazing system may improve wildlife habitat far more effectively than the chaining or burning and seeding of 5,500 acres identified in Issue 8, #4. Vegetation manipulation on critical wildlife areas is very risky!

ISSUE 9: RIPARIAN/STREAM HABITAT. We support the Resource Protection proposal on riparian/stream habitat. We again commend BLM for its excellent identification, analysis, and proposed solutions to this long overlooked problem.

ISSUE 10: WOODLAND PRODUCTS. We support the Resource Protection

Alternative proposal for 4 RCAs under intensive management, but the Midrange Alternative and Preferred Alternative proposal for cords/yr harvest. However, some of the management actions slated for woodland products in the preferred alternative appear quite radical. Removing 75% canopy cover on deer winter range might have negative results as any additional forage obtained may be far outweighed by the loss of the thermal cover needed by deer in the winter. We totally oppose BLM proposing a timber sale on the highly valuable aspen stands (2-25) in the Elko District. Perhaps you should consider why the aspen stands are deteriorating and fit the management action to the resource problem. A good grazing system or deferrment might benefit the aspen stands far more than a fire or a chainsaw!

In general, we fear that the alternatives offered for analysis are variations of the No Action Alternative, at least as far as livestock grazing is concerned. Livestock overgrazing, the most serious of the Wells RA resource problems, has gotten lost in the discussion of the other resource problems, objectives and management actions.

While many of the proposed actions in non-livestock grazing areas sound good, we are concerned whether many of them will be implemented, due to BLM budget and staff contraints, etc. We especially question the panacea of CRMP, as CRMP will only work if all interest groups and agencies are represented in developing on-the-ground plans. Obtaining wide representation on the number of CRMP groups necessary for this huge RA will sbe difficult if not impossible. Plans developed without wide consensus are doomed to abandonment with every change in national politics. As far as the livestock grazing treatments, we wonder if any of them will be implemented. We hope Treatment 8 will be eliminated immediately, as 80% utilization of any native plant, whether growing or dormant, is very unwise. We greatly hope that BLM really intends to use its monitoring data to adjust stocking rates to vegetation needs. By 1984, BLM will have 3 years of monitoring data (2-30). Will stocking rates be adjusted in 1984? How many years of data does BLM need to adjust livestock numbers to the carrying capacity of the range?

We strongly support the inclusion of the Western State's Sage Grouse Guidelines in the Standard Operating Procedures (2-32). We also strongly urge the addition of a fourth factor to #16 ORV designation (2-32) - to protect the RA from any undue environmental degradation, especially erosion.

CHAPTER 3: AFFECTED ENVIRONMENT

Indirectly, this chapter does document the majority of resource problems in the Wells RA. We were very disappointed to learn that only 9 allotments have AMPs. This deficiency probably explains why so much of the RA is in poor condition and why there are so many livestock-wildlife conflicts. We hope BLM will strongly pursue the development of AMPs on all allotments with resource conflicts and poor range conditions. The work done on riparian areas in this RA is excellent. We only hope the solutions match the identification of the problems!

We were quite amused to read that the AUM a wild horse consumes is worth $7.88, but the AUM a cow and calf consume costs the permittee only $1.41. Either the value of a wild horse AUM should receive the same subsidy domestic livestock receives or the subsidy the livestock industry receives in lower grazing fees should be calculated into public costs of livestock grazing!

We were also startled to learn that greasewood and horsebrush are poisonous plants, as we have observed both plants being browsed by cattle. We fervently hope that the Elko District does not have any poisonous plant control programs in mind for our native plants, especially rare Astragalus!

CHAPTER 4: ENVIRONMENTAL CONSEQUENCES

Generally, a good effort is made to evaluate the environmental impacts of proposed actions. We do have some questions, however.

GENERAL ASSUMPTIONS. Why baseline (4-2) data for vegetation condition and trend, habitat condition, and other parameters is adequate for planning and analysis purposes and is not adequate for making forage allocation decisions is incomprehensible to us. Please explain.

OTHER THRESHOLDS. What possible justification exists for the statement that a significant adverse impact to mineral development would occur if 1% of lands within an RCA or the Wells RA were segregated from mineral entry? I can understand the statement if made by the Nevada Mining Association, but not from the Bureau of Land Managment which is supposed to be managing the public lands for multiple use!

Our last comments are on the economic analysis, not the one in Chapter 4, but our own on the implementation costs by alternative (Table 2-7). It appears that the 33% increase proposed for livestock grazing in the Resource Production Alternative would cost the public over $71/AUM. At $1.41/AUM, it would take over 50 years to amortize that investment. On the other hand, it appears a far better deal than that in the Preferred Alternative which proposes to spend $2,381,500 on livestock grazing improvements for a 2% increase in AUMs, or over $484/AUM. We didn't try to calculate the pay-back time!

It took us many hours to review the DRMP and DEIS. We are left with a hazy view of the Wells RA, its users, its problems and conflicts, and its managers. We trust that its managers have the necessary skills and courage to make the best land use decisions based on this ambivalent document and to implement those decisions in our lifetimes!

Sincerely,

Rose Strickland

Rose Strickland, Chair, Public Lands Committee

Comment Letter 33

Nevada
Cattlemen's
Association
419 Railroad Street · Elko, Nevada 89801
(702) 738-9214

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John Marvel
Battle Mountain
Robert R. Wright
Clover Valley, Wells
Dave Secrist
Elko
E.E. (Ned) Eyre
Eureka

August 18, 1983

Bureau of Land Management
Rod Harris, District Manager
Elko District
P.O. Box 831
Elko, NV 89801

Dear Mr. Harris:

The following comments on the Wells Resource Area RMP are on behalf of the Nevada Cattlemen's Association.

Alternatives: We support the addition of Alternative Six as submitted by the N-1 Nevada Grazing Board.

General: We have received Lester McKenzie's comments on behalf of the N-1 Grazing Board and support them in their entirety. Much effort has gone into these comments and they are quite thorough. The record should show that we express, and support, each of the points brought up by Mr. McKenzie. We would also appreciate a copy of BLM's response to these questions, points, and concerns. In addition to Mr. McKenzie's comments we offer the following:

1. In general the RMP makes proposals for future management direction based on either inadequate or insufficient data. Projected numbers of livestock and wildlife are purely one or several persons' expectations based on so called "professional judgement". Until BLM installs, and monitors, the study plots and cages necessary to determine the actual trend in range condition and utilization, there isn't any sound basis to make decisions which allocate forage to the range uses. Probably the persons most knowledgeable on the range conditions on specific allotments are the allotment operators.

2. Allotment Categorization. We object to the fact that allotment operators weren't involved in determining what category their allotment should be placed in. According to Washington-level BLM, the involvement by the affected livestock operators was to be an integral part of the categorization process. We cannot support the present

Comment Letter 33

categories proposed for allotments where the operator wasn't in agreement.

3. No Action Alternative - Economic Impacts Section Pp. 4-15.

   Recreation and Wildlife:
   a) On what basis does BLM predict decreased wildlife populations?
   b) Specifically, how was the predicted decrease of personal income to Elko County of approximately $54,600 per year determined?

   Livestock Grazing:
   a) The statement that under the No Action Alternative (continuance of the existing situation), no economic impacts would result to the ranching community, is incorrect. Unless BLM puts more emphasis in improving the public rangelands through additional seedings, water developments, etc. the ranching community will continue to suffer economically. As with most private enterprise businesses, they have to continue to become more efficient if they are to survive. Under present BLM management this is impossible in most instances.

   Wild Horses:
   a) Why will there be no change in wild horse numbers under present management? It is incorrect to assume that the current wild horse situation isn't having any adverse effects on the ranching economy.

4. Pg. 2-33, No. 29. Under the preferred alternative it is explained that "vegetative manipulation that would alter the potential natural plant composition will not be allowed in riparian areas". Couldn't seedings of species not included in the natural plant composition in some areas increase the speed of stabilizing degraded riparian areas?

5. Table 3-2, Pp. 3-8. How was the total Gross Income and Net Ranch Income determined? What costs were considered?

Summary: As stated previously and as explained in Mr. McKenzie's comments, this draft includes many incorrect statements and predictions. The final draft will surely be a weak document on which to guide management decisions if left unchanged from the draft.

Comment Letter 33

Bureau of Land Management
Rod Harris, District Manager
Wells Resource Management Plan Comments
Page 3
August 18, 1983

Thank you for this opportunity to comment.

Sincerely,

Paul Bottari
Executive Secretary

PB:sh

Comment Letter 34

Taylors, Ltd.
2110 InterFirst Tower
Austin, Texas 78701
512/478-1871

August 16, 1983

Mr. Rodney Harris, District Manager
Buresu of Land Management - Elko District Office
P. O. Box 831
Elko, Nevada 89801

RE: BLM Wells Area Environmental Impact Study

Dear Mr. Harris:

This letter is to register our thoughts and objections to the subject study. I would like to make the following comments:

1) The Wood Hills are not correctly identified on the map.

2) You state that having our cattle in the Wood Hills affects feed for the deer. I strongly disagree as there are very few deer and they seldom come into the area where we are located. There is feed that has not been used for many years due to no cattle or deer having grazed. The lack of water affects even the deer. In all of our years in the area, we have never seen or had hunters who wanted to go on the Wood Hills as they prefer the Pequop or Ruby Mountains which are nearby and much better for deer.

3) Until very recently it has been impossible to develop water or build fences in the Wood Hills area due to a freeze by the BLM. This has greatly handicapped us in our use of the Wood Hills Allotment. We would like to have drilled wells, built dams, installed water pipelines, and built fences if we had been permitted to do so.

4) We recommend that the Alternative Plan proposed by the Nevada Grazing Board for District N-1 be adopted.

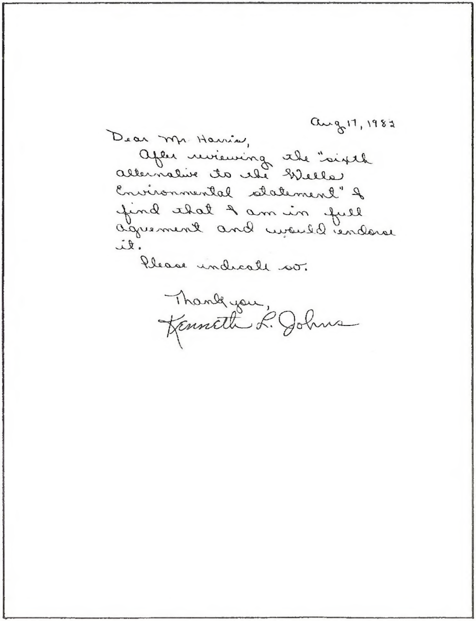
5) The Wood Hills are checkerboarded with Southern Pacific Railroad land. This checkerboard area should be traded out.

Very truly yours,
TAYLORS, LTD.

Jack G. Taylor

JGT:c
cc Rulon Brown

Comment Letter 35



Aug 17, 1983

Dear Mr. Harris,

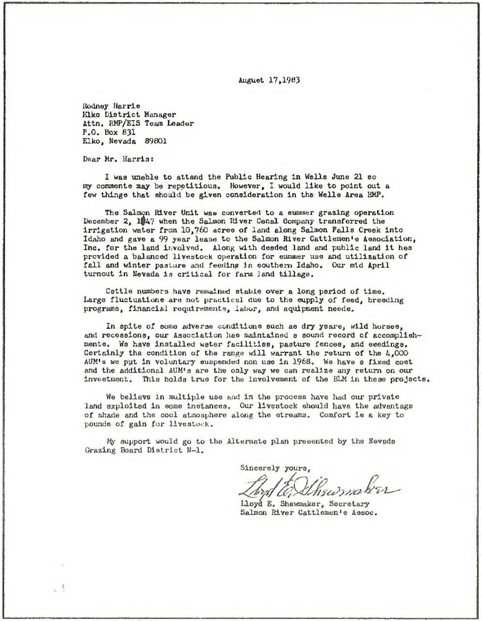
After reviewing the "sixth alternative to the Wells Environmental statement" I find that I am in full agreement and would endorse it.

Please indicate so.

Thank you,

Kenneth L. Johns

Comment Letter 36



August 17,1983

Rodney Harris
Elko District Manager
Attn. RMP/EIS Team Leader
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

I was unable to attend the Public Hearing in Wells June 21 so my comments may be repetitious. However, I would like to point out a few things that should be given consideration in the Wells Area RMP.

The Salmon River Unit was converted to a summer grazing operation December 2, 1947 when the Salmon River Canal Company transferred the irrigation water from 10,760 acres of land along Salmon Falls Creek into Idaho and gave a 99 year lease to the Salmon River Cattlemen's Association, Inc. for the land involved. Along with deeded land and public land it has provided a balanced livestock operation for summer use and utilization of fall and winter pasture and feeding in southern Idaho. Our mid April turnout in Nevada is critical for farm land tillage.

Cattle numbers have remained stable over a long period of time. Large fluctuations are not practical due to the supply of feed, breeding programs, financial requirements, labor, and equipment needs.

In spite of some adverse conditions such as dry years, wild horses, and recessions, our Association has maintained a sound record of accomplishments. We have installed water facilities, pasture fences, and seedings. Certainly the condition of the range will warrant the return of the 4,000 AUM's we put in voluntary suspended non use in 1968. We have a fixed cost and the additional AUM's are the only way we can realize any return on our investment. This holds true for the involvement of the BLM in these projects.

We believe in multiple use and in the process have had our private land exploited in some instances. Our livestock should have the advantage of shade and the cool atmosphere along the streams. Comfort is a key to pounds of gain for livestock.

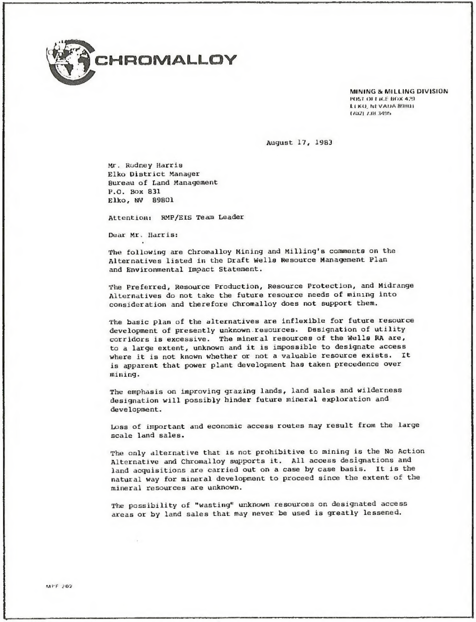
My support would go to the Alternate plan presented by the Nevada Grazing Board District N-1.

Sincerely yours,

Lloyd E. Shawmaker

Lloyd E. Shawmaker, Secretary
Salmon River Cattlemen's Assoc.

Comment Letter 37



CHROMALLOY

MINING & MILLING DIVISION
POST OFFICE BOX 429
ELKO, NEVADA 89801
(702) 738 3495

August 17, 1983

Mr. Rodney Harris
Elko District Manager
Bureau of Land Management
P.O. Box 831
Elko, NV 89801

Attention: RMP/EIS Team Leader

Dear Mr. Harris:

The following are Chromalloy Mining and Milling's comments on the Alternatives listed in the Draft Wells Resource Management Plan and Environmental Impact Statement.

The Preferred, Resource Production, Resource Protection, and Midrange Alternatives do not take the future resource needs of mining into consideration and therefore Chromalloy does not support them.

The basic plan of the alternatives are inflexible for future resource development of presently unknown resources. Designation of utility corridors is excessive. The mineral resources of the Wells RA are, to a large extent, unknown and it is impossible to designate access where it is not known whether or not a valuable resource exists. It is apparent that power plant development has taken precedence over mining.

The emphasis on improving grazing lands, land sales and wilderness designation will possibly hinder future mineral exploration and development.

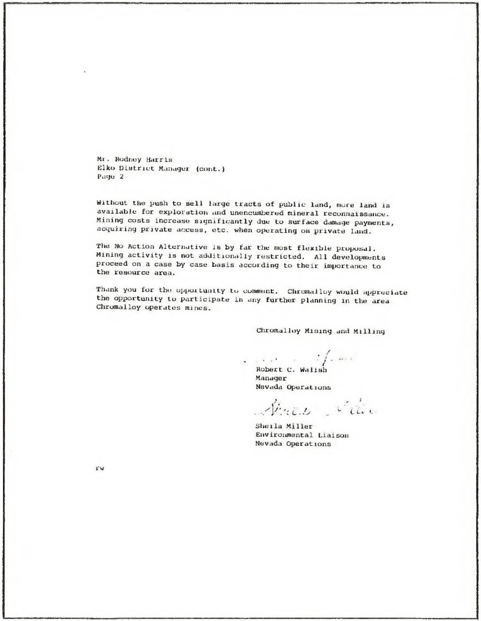
Loss of important and economic access routes may result from the large scale land sales.

The only alternative that is not prohibitive to mining is the No Action Alternative and Chromalloy supports it. All access designations and land acquisitions are carried out on a case by case basis. It is the natural way for mineral development to proceed since the extent of the mineral resources are unknown.

The possibility of "wasting" unknown resources on designated access areas or by land sales that may never be used is greatly lessened.

MPF 202

Comment Letter 37



Mr. Rodney Harris
Elko District Manager (cont.)
Page 2

Without the push to sell large tracts of public land, more land is available for exploration and unencumbered mineral reconnaissance. Mining costs increase significantly due to surface damage payments, acquiring private access, etc. when operating on private land.

The No Action Alternative is by far the most flexible proposal. Mining activity is not additionally restricted. All developments proceed on a case by case basis according to their importance to the resource area.

Thank you for the opportunity to comment. Chromalloy would appreciate the opportunity to participate in any further planning in the area Chromalloy operates mines.

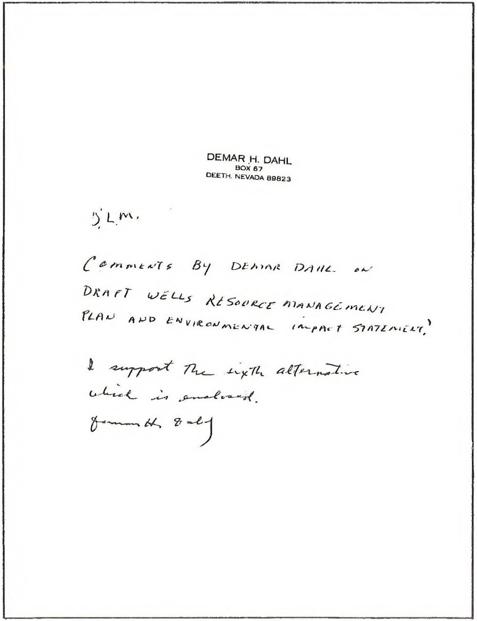
Chromalloy Mining and Milling

Robert C. Walish
Manager
Nevada Operations

Sheila Miller
Environmental Liaison
Nevada Operations

rw

Comment Letter 38



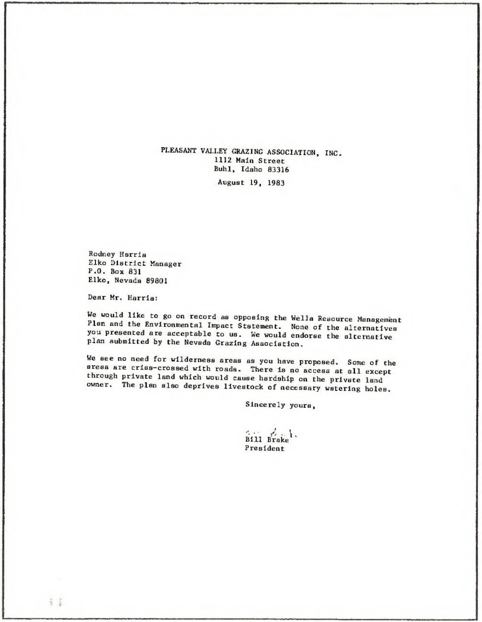
DEMAR H. DAHL
BOX 67
DEETH, NEVADA 89823

B.L.M.

Comments By DEMAR DAHL on DRAFT WELLS RESOURCE MANAGEMENT PLAN AND ENVIRONMENTAL IMPACT STATEMENT,

I support the sixth alternative which is enclosed.

Comment Letter 39



PLEASANT VALLEY GRAZING ASSOCIATION, INC.
1112 Main Street
Buhl, Idaho 83316

August 19, 1983

Rodney Harris
Elko District Manager
P.O. Box 831
Elko, Nevada 89801

Dear Mr. Harris:

We would like to go on record as opposing the Wells Resource Management Plan and the Environmental Impact Statement. None of the alternatives you presented are acceptable to us. We would endorse the alternative plan submitted by the Nevada Grazing Association.

We see no need for wilderness areas as you have proposed. Some of the areas are criss-crossed with roads. There is no access at all except through private land which would cause hardship on the private land owner. The plan also deprives livestock of necessary watering holes.

Sincerely yours,

Bill Brake
President

RENO OFFICE
GEORGE L. VARGAS
JOHN C. BARTLETT (1910-1982)
ROBERT A. MARSHALL
JAMES P. LOGAN
JOHN L. RENSHAW
ALBERT F. PAGNI
FREDERIC R. STARICH
JOHN P. SANDE, III
JOHN P. FOWLER
PHILLIP W. BARTLETT
BRUCE A. LESLIE
[illegible]
[illegible] BOWMAN
STEPHEN S. KENT
[illegible] B. ARMSTRONG
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WILLIAM N. [illegible]
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H. GREGORY NASKY
THOMAS F. KUMMER
CHRISTOPHER L. KAEMPFER
MARTHA J. ASHCRAFT
MICHAEL J. BONNER
KATHLEEN JANE ENGLAND
MARK A. KEMP
ANDREW J. URBAN, JR

August 19, 1983

Bureau of Land Management
Nevada State Office
300 Booth Street
Reno, Nevada 89520

Re: Comments on Draft Wells Resource Management Plan and Environmental Impact Statement and Wells Wildermess Technical Report - Bluebell Wilderness Study Area NV 010-027.

Gentlemen:

This office has been asked by Duval Corporation to comment on the above-referenced documents with regard to the Bluebell Wilderness Study Area located about ninety-five miles east of Elko and ten miles west of West Wendover, Nevada, in the Goshute Mountain Range.

We have had the opportunity to review the final report prepared by Great Basin GEM Joint Venture dated May 6, 1983, and in particular those sections dealing with metallic minerals

The GEM report referred to above discusses the mineral economics for the Bluebell and Goshute Peak Resource Area. At page 14 of that report the following is contained:

> Base and precious metal deposits such as those at Ferguson Spring can be mined profitably if they are large and high enough grade. From the descriptions the bodies mined in the past were probably not profitable, nor would they be today. However, in this terrane (sic) of abundant carbonate rocks, it is possible there may be a Carlin-type disseminated gold deposit that could be mined very profitably by

---

> open pit methods. Probably most of the recent staking in the GRA was directed toward targets of this type.

In the same report at page 24, the authors set forth the fact that they believed the quality of data pertaining to mineralization in the area is low and its quality is correspondingly low, but that their level of confidence in the geological data is high, but the level of confidence in mineralization data is low.

The GEM report also contains recommendations for additional work:

> Because of the apparent lack of previous prospecting in the interior of the mountains, geological reconnaissance for mineral occurrences is recommended. To supplement this a geochemical survey should be made with at least sampling of sediments in streams and washes all around the edges of the mountains. (page 30)

1 Duval believes the conclusions reached for the Bluebell WSA contained in the Wells Wilderness Technical Report dated April 1983 does not take into account the final report prepared by Great Basin GEM Joint Venture dated May 6, 1983, referenced above. The Technical Report states:

1. There is no active mining in the WSA.

2. Minor exploration has taken place, but no mineral development has occurred within the WSA and no significant ore deposits are known to exist.

4. The great majority of the WSA has low mineral potential for all commodities. (page 22)

1 As noted in the Technical Report, with wilderness designation the area would be segregated from all forms of mineral entry with the exception of valid existing rights. In light of the GEM final report and the recommendations for additional work contained therein, and the lack of information at this time

Comment Letter 40

Bureau of Land Management
Nevada State Office
August 19, 1983
Page 3

1 with regard to mineralization in the area, most particularly in the abundant carbonate rocks which are known to exist in the area, we would like to see the period for comment be extended until such further information can be obtained and made available. In the alternative, we would suggest the resource production alternative be implemented, or nondesignation take place.

Should you have any questions regarding these comments, please do not hesitate to contact me.

Sincerely,

VARGAS & BARTLETT

Linda A. Bowman

Linda A. Bowman

Response Letter 40

RESPONSE

1. Geology, Energy and Minerals (G.E.M.) assessments were prepared for all WSAs in the Wells Resource Area and were fully considered in the wilderness suitability recommendations. Public comment on mineral potential in the WSAs was solicited and literature reviewed. All claims were examined along with general reconnaissance of the WSAs. Mineral potential of the WSAs was then classified based on known mineral occurrences. Minerals information used in the Draft Wells RMP was felt to be the best available at the time. The U.S. Geological Survey and U.S. Bureau of Mines will preform more detailed mineral potential evaluations of the WSAs prior to the Department of the Interior making a recommendation on suitable areas to the President. Adjustments in recommendations could occur if additional significant mineral resources are identified and these mineral resources outweigh wilderness values.

Testimony 1

Paul Hartley, District Geologist, Texas Gulf Minerals and Metals Company

1 "Within the South Pequop Wilderness Study Area the north half of Area A posed moderate potential for low-grade phosphate reserves, and high potential for carbonate-hosted lead, zinc and silver deposits throughout the Wilderness Study Area within the middle to late-Paleozoic rocks; moderate to high potential for carbonate-hosted lead, zinc and silver deposits exists within ninety percent of the Bluebell Wilderness Study Area; and moderate potential for low-grade gold systems is also present, but over a much more restricted area, primarily Area B."

To the south, within the Goshutes Peak Wilderness Study Area there is excellent potential for Alligator Ridge-type gold occurrences -- these are low-grade gold deposits -- within Areas B and C and moderate to high potential for carbonate-hosted lead, zinc and silver deposits present within the remaining areas to the west."

Testimony

RESPONSE

1. Geology, Energy and Minerals (G.E.M.) assessments were prepared for all WSAs in the Wells Resource Area and were fully considered in the wilderness suitability recommendations. Public comment on mineral potential in the WSAs was solicited and literature reviewed. All claims were examined along with general reconnaissance of the WSAs. Mineral potential of the WSAs was then classified based on known mineral occurrences. Minerals information used in the Draft Wells RMP was felt to be the best available at the time. The U.S. Geological Survey and U.S. Bureau of Mines will preform more detailed mineral potential evaluations of the WSAs prior to the Department of the Interior making a recommendation on suitable areas to the President. Adjustments in recommendations could occur if additional significant mineral resources are identified and these mineral resources outweigh wilderness values.

Bob Warren, Executive Secretary, Nevada Mining Association

1 "Now, you have five or six usable and important necessary access roads in the Bluebell WSA; you have at least four according to geologists who have been in and out of the area and reported to me in the South Pequop area; and three not-so-great roads but accessible roads for purposes of prospecting and access for the general public for recreational activities, as well as cattlemen, in the Goshute area."

2 "Now, the Mining Association has responded to this, we put together a team of nine of the outstanding geologists or exploration firms in the Reno area. That means they are nine of the outstanding in the nation because we have the top exploration firms and talent now in the United States in the Reno area.

And they have further reviewed and added some first-hand on-the-spot information, as you heard earlier from the gentleman who spoke first. And, they have found -- reading from our summary of this -- the South Pequop area the gem rating is slightly low based upon exploration data by Freeport Exploration and others.

They note that the bulk of the mountain range is Paleozoic with favorable stratigraphy penisive (ph) host rocks. And, this is something that has not been given proper attention in the gem report."

3 "But, the Bluebell, as was pointed out, is a high potential for carbon-type disseminated gold mineralization."

4 "The absence of claims is no indicator of lack of mineralization under modern day geologic methods."

1 "You realize that a road merely needs to be a way of egress, in and out, and it doesn't have to be maintained even. According to the Interior Board of Land Appeals it can be maintained merely by driving in and out."

5 "You pointed out the user day benefits that you estimated might take place under wilderness designation. You did not, and you should quite definitely, point the user day benefits for vehicle-related activity, vehicles related to recreation that would be foregone, or that is presently enjoyed but would be foregone under the wilderness designation."

6 ". . . It states: "Mineral development would not be adversely impacted because of wilderness designation.

That is a startling statement, it's a totally uninformed statement. Not only are the mining companies unable to mine the wildernesses, as we all know, but it is virtually impossible because of lawsuits that would be brought by the National Resources Defense Council and others and the heavy regulatory costs that would be imposed to mine anywhere near a wilderness."

Response

1. The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. a way maintained solely by the passage of vehciles does not constitute a road." The Interior board of Land Appeals (I.B.L.A.) has not reversed this decision. Additionally, the I.B.L.A. has ruled the use of cherrystem roads by the BLM as an acceptable practice in delinating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

2. Geology, Energy and Minerals (G.E.M.) assessments were prepared for all WSAs in the Wells Resource Area and were fully considered in the wilderness suitability recommendations. Public comment on mineral potential in the WSAs was solicited and literature reviewed. All claims were examined along with general reconnaissance of the WSAs. Mineral potential of the WSAs was then classified based on known mineral occurrences. Minerals information used in the Draft Wells RMP was felt to be the best available at the time. The U.S. Geological Survey and U.S. Bureau of Mines will preform more detailed mineral potential evaluations of the WSAs prior to the Department of the Interior making a recommendation on suitable areas to the President. Adjustments in recommendations could occur if additional significant mineral resources are identified and these mineral resources outweigh wilderness values.

3. To date there has been little production of gold in the Wells Resource Area. The major gold belt in Nevada is located west of the Wells Resource Area in the western half of Elko County.

4. Mining claims were not used as the basis for determining mineral potential classification, but did serve to deliniate first priority areas for a field evaluation.

5. Refer to the recreation sections of Chapter 4 in this document.

6. Page 4-25 of the Draft Wells Resource Area RMP/EIS states "...no significant adverse impacts to minerals would occur in the long-term." The document does not state that "mineral development would not be adversely impacted because of wilderness designation." Refer to the minerals and economic sections of Chapter 4 in this document.

Testimony 3

Dave Hornbeck

1 "This is such a miniscule difference that I do not discern a valid reason for not going with the entire resource protection versus the perferred alternative, especially where. . ."

Testimony

Response

1. The acreage differences reflect acres recommenddd nonsuitable to eliminate or reduce resource conflicts.

Les Mckenzie, Consultant, District N-1 Grazing Board

1 "Roads in two of the areas should have eliminated them from consideration on the basis of size and naturalists."

2 ". . . No mention has been made of the adverse effect wilderness designation would have on persons who utilize motor vehicles to carry them and their belongings into the areas to hunt, gather pinenuts, cut wood, cut Christmas trees, observe wildlife, study nature, look at fossils or carry out other recreational pursuits, for the use of the motor vehicle is incidental but necessary for transportation. These are evidently the 1,750 days of existing use shown on page 3-20 of the report."

3 "There is, by the way, a considerable difference between the estimated visitor use days shown on this document and those contained in the management situation analysis."

Response

1 The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. s way maintained solely by the passage of vehciles does not constitute a road." The Interior board of Land Appeals (I.B.L.A.) has not reversed this decision. Additionally, the I.B.L.A. has ruled the use of cherrystem roads by the BLM as an acceptable practice in deliniating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

2 Refer to the recreation sections of Chapter 4 in this document.

3 There is no difference between the visitor days displayed for wilderness on page 93 of the revised MSA dated January 1983 and those on page 3-20 of the Draft Wells Resource Area RMP/EIS.

Testimony 5

Von Sorensen

1 "I feel that these designated study areas are not truly representative of wilderness criteria. They are traversed by various roads that we have used and maintained over the years."

Testimony

Response

1. The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. a way maintained solely by the passage of vehciles does not constitute a road." The Interior board of Land Appeals (I.B.L.A.) has not reversed this decision. Additionally, the I.B.L.A. has ruled the use of cherrystem roads by the BLM as an acceptable practice in deliniating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

Marta Agee

1 ". . . area, and we feel that the Badlands area has real problems for potential wilderness. Mainly, it is a small area, there's not many acres involved, and the strip to the middle that is really ideal for wilderness is so very narrow and small, you could put very few people in there to adequately have a really worthwhile wilderness experience.

We've boated that river. There are two or three camping places where you can spend the night, and if you make that a wilderness area where there are only three or four ideal camping spots, you can't manage with that few of a -- with those few of camping spots, adequately from an Elko office, to staff it out there. It just seems totally impractical."

2 ". . . becomes, if you add more people to make it wilderness, then you add the big horn sheep, you're practically adding two uses that are going to conflict."

3 ". . . is a prime wintering area for deer. So, if you add your big horn sheep into that you're going to probably lose some of your prime winter habitat for your deer."

Response

1. All Wilderness Study Areas in the Wells Resource Area were determined to have wilderness characteristics as documented in the Wilderness Study Area Decisions document published November 15, 1980. Guidance for conducting the wilderness inventory was contained in the BLM Wilderness Inventory Handbook. The purpose of the wilderness study is to analyze the impacts to other resources and users of designating or not designating the areas as wilderness.

2. Some increased visitor use is expected with wilderness designation. However, this increased use, which is expected to be about 2,000 visitor days by the year 2,000, is not anticiapted to result in conflicts with bighorn sheep inhabiting the WSA and/or surrounding lands.

3. No conflicts would arise between mule deer and bighorn sheep utilizing the same range.

Loyd Sorensen

1 "Now, coming to wilderness. We have very few areas in the Wells resource area that would fit the wilderness criteria that they set up, and in order to get by with the acreage, you had to cherry-stem these mountains to get the acreage that was required for a wilderness area."

Response

1 The determinations of access routes being either roads or ways during the wilderness inventory process were based on the Wilderness Inventory Handbook, published September 27, 1978. Page 5 of that document states "the word roadless refers to the absence of roads which have been improved and maintained by mechanical means to insure relatively regular and continuous use. a way maintained solely by the passage of vehciles does not constitute a road." The Interior board of Land Appeals (I.B.L.A.) has not reversed this decision. Additionally, the I.B.L.A. has ruled the use of cherrystem roads by the BLM as an acceptable practice in deliniating WSA boundaries and that the use of cherrystemming is consistent with the Wilderness Act of 1964.

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